1.0 Introduction

1.1 Carter Jonas LLP acts on behalf of Oxford Preservation Trust (‘the Trust’), an independent heritage conservation charity and the owners of four fields in North Hinksey, Hinksey Meadow and North Hinksey Fields which are directly affected by the scheme. Some of these fields are affected by restrictive covenants, are rare meadow habitats and the home of some rare plants all of which will be adversely affected.

1.2 Oxford Preservation Trust was established in 1927 as a charity and local amenity society with the principal aim of conserving and enhancing Oxford and its setting. It takes a forward thinking and positive approach to development, looking to influence change rather than stopping it, preserving the best of the old and encouraging the best of the new. It is committed to ensuring that Oxford can continue to flourish and prosper, whilst protecting its historic character and setting.

1.3 The Trust owns and looks after 1000 acres of land in and around Oxford making green space available for local people to benefit from and enjoy.

1.4 The Trust has detailed knowledge and expertise built up over a number of years so that it is legitimately recognised as a professional and experienced voice, able to speak with conviction on matters relating to landscape, views and the impact of development on the City of Oxford and its green setting and surrounds.

1.5 The Trust recognises that it is not an expert in hydrology and therefore does not make detailed comments on the likely efficacy of the scheme. The Trust does, however, observe that the value of the scheme appears marginal in terms of the proposed increased flow rates created by the scheme. The Trust asks for a full understanding of the necessary complementary measures needed to ensure that the scheme will function in the way suggested and that these are included within the scheme, such as dredging of the main river and streams through the City. This matter is of specific interest to the Trust in the exercise of balancing the benefits of the scheme against the harm it will cause.

1.6 The Trust has reviewed the large amounts of supporting documentation for the above listed application and submits this letter as a formal comment. The Trust has considered policies from the National Planning Policy Framework, Oxfordshire Minerals and Waste Core Strategy, the
The Trust notes that the size of the scheme is over 133 Ha through Oxford’s Green Belt. The sheer scale of the whole scheme has meant that in the lead up to the application the information has come through in an often piecemeal way. The Trust feels that it is important to point out that at the outset it appeared that the Environment Agency (EA) had designed the scheme without a full understanding of the implications to the landscape and environment. The important biodiversity of Hinksey Meadow had not been taken fully into account. In the opinion of the Floodplain Meadows Partnership, the country’s experts in floodplain meadows, the quality of the Hinksey Meadow is better than the Sites of Special Scientific Interest (SSSI) that make up Oxford Meadows Special Area of Conservation (Pixey and Yarnton Meads) and the New Marston SSSI fields on the River Cherwell. Hinksey Meadow and one of the Trust’s fields on the other side of Willow Walk are designated Local Wildlife Sites.

The Trust’s first preference is that the scheme should be remodelled to allow Hinksey Meadow to remain untouched. This important meadow has been managed in the same way for hundreds of years and is classified as MG4a grassland (the *Dactylis* (Cocksfoot) subcommunity) under the National Vegetation Classification. With 25.6 species per square metre on average, this is the richest, most revered subcommunity of MG4. Such meadows have become increasingly rare and there are just 192 Hectares remaining nationally. The scheme as presented will definitely destroy 2 Ha with the whole 7 Ha meadow at significant risk due to changes to the hydrology caused by the creation of the channel. This is an impact recognised by the EA and, indeed, the Trust acknowledges the changes that have been made to the scheme at the Trust’s request since its first inception, by reducing the width of the channel. The Trust maintains its concerns about the loss of the MG4 grassland and seeks further compensation in this regard, further detail of potential compensation is included at paragraphs 3.5 and 3.6 below.

The Trust feels that it cannot object to the principle of the above application as it recognises the need to manage flood risk, especially in the face of climate change.

The Trust does, however, strongly object to a number of the details within the scheme. There is substantial concern about the following areas of the application:

1. the existing watercourses and drainage channels are not being kept clear and maintained which is an essential part of the current flood management and the success of any future scheme;
2. there is less public benefit than claimed, and there are problems of reduced public access;
3. the loss of a very considerable number of trees and the plans for some replanting and management across the whole scheme, which will detrimentally affect the purposes of the Green Belt and the setting of heritage assets;
4. the design of elements of the scheme – specifically the bridges at Willow Walk, North Hinksey Causeway and others – do not pay sufficient regard to the significance and setting of North Hinksey Conservation Area or the purpose of the land as part of the Green Belt;
5. the impact on archaeology;
6. the general impact of maintenance tracks throughout the full length of the scheme;
7. the ongoing maintenance of the new channel over the 100-year period of the scheme; and,
8. the lack of transparency and public engagement during this period of the public consultation on the planning application which has made it difficult for local people to understand the documentation and to get to grips with the scale and magnitude of the

This is a full planning application and as such, detailed matters such as design and ongoing maintenance must be considered now with great care to ensure that the resultant development is suitable for its very special location.
1.12 If this development is to take place in the Green Belt, it is the Trust’s view that the applicant has not fully demonstrated that there are very special circumstances over and above the reduction in flood risk. The Trust is concerned that there is no proper assessment of the planning balance against the harm to be caused by inappropriateness or any other harm. In this regard, increased public access, and safer off-road links between the communities on the western side of Oxford, along with the preservation of the historic setting of Oxford would be a real, and long-lasting benefit for the people of Oxford and would need to be properly secured should permission be granted. This will need to be a decision of the determining authority.

2.0 Problems of reduced access

2.1 The Planning Statement in support of the application contains a Green Belt statement. The necessity for this Green Belt statement is to consider the impact of the scheme in Green Belt terms and to weigh the public benefits of the scheme against the harm that it will have. This is to ensure compliance with National Planning Policy Framework (NPPF) paragraph 88:

“When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.”

The provisions of paragraph 88 – the need for very special circumstances and the balancing of harm - are also translated in to the Oxfordshire Minerals and Waste Core Strategy Policy C12.

2.2 The Trust makes the case in this letter that the harm to the Green Belt is to its openness and historic character. This harm is the creeping suburbanisation created by the development and particularly the crudely designed bridges which are out of keeping with the rural character of the area. The public benefits of the scheme are of better managed flood risk, but much of the other claimed benefits appear not to have been delivered, chief amongst the absent public benefit is the improved access to the countryside. This concept is outlined in the NPPF at paragraph 81:

“...local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access...”

2.3 When the scheme was first promoted, stakeholders were told that a key objective was the ‘Greenness’ of the scheme. It was stated that there was an aspiration to connect people to the natural environment. Indeed, a particular benefit of the Green Belt is to increase the opportunities for people to access the countryside. There was, and continues to be, a perception that this scheme would result in an increased level of public access to open space. It is surprising and disappointing that the applicant has failed to achieve this tangible community benefit. The Trust notes that the opening up to the public of the “Electric Road” linking North and South Hinksey has not been included in the scheme and it also appears that earlier promises to deliver a ‘nature park’ throughout the pre-application public consultations were also over stated.

2.4 The Trust notes a passage in the Planning Statement on page 77 – referring to the community benefits of the scheme – that states:

“Whilst there will not be any additional public rights of way included in proposals, the scheme will help to improve and upgrade a number of the existing east - west sustainable transport links for walkers and cyclists through the floodplain.”

The Trust is unconvinced that there will be notable improvements to pedestrian and cycle links. The only improvement is likely to be that the footpaths do not flood quite as often as they once did and this is a benefit captured through the overall flood alleviation of Oxford, not an additional public benefit. The lack of improved public access and open space is an unfortunate missed opportunity
2.5 A further point which the Trust seeks confirmation of, as a land owner within the proposed scheme, is the need for a condition that requires a gate to access Hinksey Meadow east of Willow Walk Bridge. This will be necessary to maintain the land in its current use as a meadow for grazing, and this in turn will ensure the management of the MG4 grassland. Grazing is also a challenge for the Trust as a land owner as it is understood that there is to be an outright restriction on the installation of permanent livestock proof fencing at the north of the scheme between the Trust owned land and the Botley Road. The Trust requests that the inclusion of appropriate and agreed livestock fencing is included within the scheme, or is required through condition, to ensure the continued existing use of Hinksey Meadow and the careful management of its special biodiversity.

3.0 The management of trees across the whole scheme

3.1 The very significant loss of trees to enable the scheme is disappointing, and remains a very great concern to the Trust. There are hundreds of trees to be lost (see below) which will have a harmful effect on the rural character and feel of the area and its local distinctiveness, which will be replaced by a sense of creeping suburbanisation. The arboricultural assessment submitted with the application reports:

“Overall the proposed development will require the removal of 300 individual trees and fifty-two groups of trees. The partial removal of a further twenty-five tree groups will also be required.”

The Trust requests clarity, in the above description of lost trees, and in the definition of the phrase “group of trees.” Upon reviewing the drawings appended to the arboriculture reports – especially C124555-03-01 – it appears that a number of “groups” are identified for loss along Willow Walk as well as individual trees. If trees on Willow Walk are considered by the applicant to be a group, then the above quote underplays the number of trees that are at risk. Many more hundreds of trees within the “52 groups” are planned to be felled. The Trust asks that the applicant is required to give a clearer number of trees to be removed.

3.2 Setting aside any biodiversity impacts, the Trust submits that the loss of the trees will dramatically change the character of the green space between North Hinksey, Botley and the City. This issue will directly impact one of the purposes of the Green Belt: the setting of the City of Oxford – an internationally important, beautiful and historically significant City. This is contrary to the NPPF that contains, at paragraph 80, the purposes of the Green Belt. The fourth purpose is “to preserve the setting and special character of historic towns.” Policy CS4 of the Oxford Core Strategy reflect this requirement by stating that land will only be considered for release from the Green Belt or for development where:

“...development would not detract from the landscape setting or special character of Oxford.”

3.3 The Trust explores further policy contraventions in the setting of the City and other heritage assets later in this letter. The Trust seeks a condition to the application, should it be approved, that no more trees than are completely necessary are removed. Also, that as many as is practicable are replanted in the same locations after the development of the bridges has been completed. The Trust would ideally like to be party to any discussions held about conditioned planting schemes, because the character of the area is inextricably linked with the planting and location of trees. For example there is a significant difference between planting trees in an avenue with some inter-visibility, and a dense copse of trees that block out any views. This is of key importance for the
setting of the City of Oxford, but also more generally in “keeping land permanently open” as
required by NPPF paragraph 79.

3.4 The Trust notes a further assertion in the Environmental Statement on page 107 that:

“...within the Scheme area (through the creation of new woodland areas, additional
planting and wildlife areas). Care has also been taken to ensure that new locations for tree
planting will not obscure the Oxford View Cones.”

The Trust welcomes the recognition of the importance of preserving the Oxford View cones, but
suggests a note of caution in the planting of additional woodland areas and the potential impact
that these might have on the openness of the Green Belt, and the setting of the City of Oxford and
the North Hinksey Conservation Area.

3.5 Proposals to increase tree density particularly on the land behind ‘Jewson’ and ‘Pets at Home’ will
also impact on the openness of the Green Belt. This area between Hinksey Meadow and Osney
Mead industrial estate currently appears open when viewed from within the meadows and to
encroach upon the meadow will restrict its feeling of openness and an intrinsic value of its Green
Belt status.

3.6 The Trust, as custodian of this important and biodiverse grassland, suggests that the “Jewson land”
could be better used for compensatory MG4 grassland. This would not only directly compensate
for lost biodiversity but also better preserve the openness of this part of the Green Belt. The Trust
feels that the likelihood of being able to establish MG4 grassland here close to the existing resource
would maximise the potential of this succeeding rather than trying to establish it off site – restoration
of MG4 grassland never having previously been achieved to the Trust's knowledge.

4.0 The design of the bridges in the scheme

4.1 The details of the design of the bridges in the scheme are of considerable concern to the Trust.
Bridges are planned at various points through the scheme and the land included in the scheme is
within the Oxford Green Belt. As explained above, a key purpose of the Green Belt is to conserve
and enhance the historic setting of the City of Oxford. This is particularly the case at Willow Walk
and the North Hinksey Causeway that are historic approaches to the City. These two paths are
also an important part of the setting for the North Hinksey Conservation Area.

4.2 The need for good design of the bridges is part of a balancing exercise of the benefits of the scheme
as a whole against its harm to the purposes of the Green Belt and the significance and setting of
heritage assets. The applicant sets out the benefits of the scheme in the Planning Statement as:
Flood alleviation; economic benefits; environmental improvements; preservation of the Green Belt;
improved access to the Green Belt; improved access to Oxford; and, opportunities for improved
public health. The Trust does not necessarily agree that all of these benefits are proven, as made
clear in this letter, but also the harm to the historic setting of the Green Belt and to the setting of
the North Hinksey Conservation Area needs to be reduced to be properly balanced against the
benefits. The Trust believes that a better design of the bridges will reduce the harm.

4.3 The historic setting of Oxford appears to be absent from the Green Belt assessment within the
Planning Statement that supports the application. There is reference to setting – and the fact that
footpath / cycle path network connections are ‘historic’ but there appears to be no proper analysis
of the fourth Green Belt purpose. The Trust considers that the fourth test – the setting of Oxford –
is vitally important in this scheme and the historic approaches to the city must be preserved and
enhanced. This is the same concern as referenced above regarding national and local policy
compliance with demonstrating ‘very special circumstances’ for development in the Green Belt
especially that would affect the historically significant City of Oxford.
The Green Belt tests – including the fourth – are assessed, however, in the Oxfordshire Green Belt Study for the Growth Board as completed by consultants LUC. The Flood Alleviation Scheme aligns with land parcel OX19 from the LUC study. The Trust believes the following excerpt from that study is important to consider, especially because the historic boundaries mentioned are land features still visible in Hinksey Meadow:

“...crossed by several important rights of way leading out towards Boars Hill and Cumnor. Historically the streams passing through this area were important boundary features, separating Berkshire and Oxfordshire and, further back in time, the Saxon kingdoms of Mercia and Wessex, so their retention in an open landscape can be considered to contribute to historic character”

The Trust does acknowledge the “industrialising elements” such as pylons and the large commercial units at Osney Mead that are referenced in both the applicant’s materials and the LUC Green Belt study. This is another example of the creeping suburbanisation of the Green Belt, the setting of Oxford City and the North Hinksey Conservation Area. The fact that these elements exist precisely adds to the fragility of rural character here and means that it is all the more important to be careful before adding further elements which might harm the setting that remains. The Trust is very clear that these industrial elements should not be used as justification to allow the area’s character to further deteriorate. Indeed, in spite of the industrialisation of the space, it has survived and therefore there is a need to preserve it and ensure its continued extraordinary survival.

It is clear then, that a deeper analysis of the Green Belt and its heritage value is necessary to add into the planning balance. As the Trust demonstrates in this letter, a more appropriate design for the bridges, which celebrates and enhances the heritage context should be selected. These details should be resubmitted to the Council, or conditioned to be agreed before the development of the bridges commences.

The applicant has considered the design of the bridges within the Environment Statement. There are particular references to these considerations on pages 107 to 109. At page 107 there is the following statement:

“Our Landscape Masterplan has been designed to compensate for the loss of valued landscape resources, changes in landscape character and adverse effects on visual amenity…”

The character of North Hinksey is a rural village within the town – within the ring road – and this is key characteristic of Oxford and its setting. This is a consideration of the Green Belt purposes, as above, but also links directly to landscape character.

The Trust considers that the visualisations at Appendix I-8 and, in particular, at Figure 7.21 – reproduced below – do not deliver against the above objectives to be sensitive to the location. The Trust cannot accept that the visualisation below shows a sensitivity or understanding of the character of Willow Walk.
Indeed, none of the suggested materials, or the scale (particularly the proposed width) of the bridges presented draw sufficient justification from their historic surroundings and rural nature and there is insufficient analysis of the opportunities that the scheme presents to enhance the landscape and heritage setting. This fails to meet the requirements of Oxford City’s policies as follows:

- **Core Strategy Policy CS18:**
  
  “Development proposals should respect and draw inspiration from Oxford’s unique historic environment… responding positively to the character and distinctiveness of the locality”

- **‘Saved’ Local Plan Policy CP1:**
  
  “Planning permission will only be granted for development which:

  a. shows a high standard of design, including landscape treatment, that respects the character and appearance of the area; and

  b. uses materials of a quality appropriate to the nature of the development, the site and its surroundings…”

- **‘Saved’ Local Plan Policy CP11:**
  
  “Planning permission will only be granted where:

  a. the landscape design relates to the function and character of the spaces and surrounding buildings…”

4.11 Vale of White Horse District Council has similar policies requiring a greater level of understanding and analysis of local character than is demonstrated by the applicant:

- **Core Policy 37:**
  
  “i. responds positively to the site and its surroundings, cultural diversity and history, conserves and enhances historic character and reinforces local identity or establishes a distinct identity whilst not preventing innovative responses to context

  ii. creates a distinctive sense of place through high quality townscape and landscaping that physically and visually integrates with its surroundings…”

- **Core Policy 44:**
  
  “The key features that contribute to the nature and quality of the Vale of White Horse District’s landscape will be protected from harmful development and where possible enhanced, in particular:

  …

…”
ii. important landscape settings of settlements

...

iv. areas or features of cultural and historic value

v. important views and visually sensitive skylines...

Where development is acceptable in principle, measures will be sought to integrate it into the landscape character and/or the townscape of the area. Proposals will need to demonstrate how they have responded to the above aspects of landscape character and will be expected to:

vii. incorporate appropriate landscape proposals that reflect the character of the area through appropriate design and management;

viii. preserve and promote local distinctiveness and diversity and, where practical, enhance damaged landscape areas…”

4.12 Turning more specifically to heritage considerations, the Trust believes that the impact of the scheme is unlikely to be considered of substantial harm to a heritage asset or assets, nevertheless, paragraph 134 of the NPPF is triggered. This, similarly to the Green Belt analysis requires a balance of the impacts against the benefits. The Environment Statement suggests at pages 108 and 109 that the following will be achieved through the scheme:

“The sensitively designed Willow Walk Bridge… The sensitively designed crossings at North Hinksey Causeway and Devil’s Backbone… will be appropriate for their semi-rural location”

4.13 The Trust contests the identification of a ‘semi-rural’ location. Whilst the industrialising elements have been acknowledged the meadows at North Hinksey in particular are rural in nature and the bridges should reflect this. The Trust does not consider that the choice of materials for the parapets is sensitive and as shown in the visualisation above (Figure 7.21) the design does not respond to the character of the area. Plates 8 and 9 – reproduced below – from the Environmental Statement show a starkly industrial railing arrangement and the visualisations referenced above demonstrate how the bridges are inappropriate for their surroundings and the setting of Oxford.

![Plates 8 and 9: Design parapets for Willow Walk and Devil’s Backbone bridges](image_url)

4.14 The Trust supports the premise of a design contained in assertions later in the Environmental statement that the applicant has “designed the new footbridges primarily with wood decking to ensure they remain low key in the pastoral landscape.” This description better describes the landscape and historic setting of the bridges. The Trust requests that further detail is provided about the low key wooden decking and why this is not appropriate for all the bridges.
4.15 The Trust seeks clarity on the necessity for the engineering specification for the Willow Walk and Devil’s Backbone bridges. City Council specifications are cited in the Environmental Statement:

- 100 year life span
- require the use of galvanised steel spans
- uprights on the parapets 1.4m high

The Trust questions whether the requirements for the Willow Walk Bridge are compliant with the capacity and weight restrictions of the existing stone bridge which the Trust understands to be 3 tonnes, the equivalent of a Land Rover with trailer say and not a tractor or heavy vehicle. The Trust questions whether an assessment has been made as to whether the vehicles that are intended to cross the Willow Walk Bridge can actually get across the stone bridge. There is the risk of the unintended consequence of an unnecessarily over engineered bridge on Willow Walk that will be significantly detrimental to the Green Belt, the setting of Oxford and the setting of the North Hinksey Conservation Area. The Trust considers that none of the engineering specification requirements preclude innovative and appropriate design for the sensitive heritage setting.

4.16 The Trust notes the following conclusion in the Environmental Statement:

“...Given the constraints associated with designing bridges that are safe for use by vehicles, cyclists and horses (in the case of Willow Walk), we have designed them to be as sensitive as possible to the landscape setting. We have selected appropriate materials to blend in with the surrounding landscape and responded to their location in the context of the city’s environment. This is particularly key in sensitive locations such as Willow Walk, where a raised walkway follows an historic route defined by an avenue of mature willow trees visible from the north through the whole of Hinksey Meadow."

It is considered that this conclusion down plays the importance of the historic setting of the City of Oxford in Green Belt terms and the significance of the setting of the North Hinksey Conservation Area.

4.17 The Trust contends that the applicant, through not properly considering the historic context for the proposed design of the bridges, has failed to comply with the following Local Plan policies:

- Oxfordshire Minerals and Waste Core Strategy – Policy C9
  “…Great weight will be given to the conservation of designated heritage assets…”

- Oxford Local Plan - HE7:
  “Planning permission will only be granted for development that preserves or enhances the special character and appearance of the conservation areas or their setting…”

- Vale of White Horse Core Policy 39:
  “ensure that new development conserves, and where possible enhances, designated heritage assets and non-designated heritage assets…”

- Vale of White Horse Local Plan Policy HE1:
  Proposals for development or other works within or affecting the setting of a conservation area will not be permitted unless they can be shown to preserve or enhance the established character or appearance of the area.

  Development will only be permitted
i) On areas such as paddocks, greens, gaps between buildings, gardens or other open spaces where it can be shown that these areas do not make a positive contribution to;
   a) the conservation area’s special interest including its relationship with its landscape setting.

4.18 The proposed bridge designs will directly affect the setting of the Conservation Area and result in the creeping suburbanisation of an important green gap. The character of North Hinksey will be adversely affected and an important approach to the Conservation Area will be dramatically changed. The solution is to choose a better, more sensitively designed surface for the Willow Walk Bridge and the parapets must have a more rural aesthetic.

5.0 The impact on archaeology

5.1 The Trust notes that the scheme will have a major impact on the archaeology of the Thames floodplain. So far are as the Trust's own direct interests are concerned it notes that, in spite of the considerable topographical and documentary evidence for the North Hinksey Causeway and the original fords at each of its ends being the original western approach to Oxford, the archaeological evaluation of this feature did not produce any supporting evidence. However the evaluation did discover a substantial medieval stone causeway between the Causeway and Willow Walk and generally recovered important new evidence for the early history of river systems across the whole area.

To ensure compliance with the Oxford City Local Plan (and in particular Policy HE2), the supporting text for which states:

“...The City Council will seek the preservation of deposits or remains through the modification of designs, including siting and location of foundations to mitigate adverse effects. Where preservation of deposits is not possible or feasible, archaeological investigation and recording may be an acceptable alternative. Planning conditions and/or a planning obligation may be used to ensure that the applicant makes satisfactory provision for archaeological investigation and recording prior to the start of the development...”

5.2 The Trust expects a condition to be applied to the permission (should it be granted) requiring that:
   further full archaeological investigations (including further geoarchaeological work) throughout the scheme, including the lengths of the North Hinksey Causeway and the newly discovered stone causeway; the results will be fully published; and the finds will deposited in an appropriate museum.

5.3 The Trust also recommends a condition (if permission is granted) that secures an archaeological method statement for necessary mitigation, that also includes significant public benefit and engagement. The Trust suggests a condition similar to that used by Oxford City Council when permitting the Westgate Shopping Centre:

“53 ...The method statement for mitigation shall identify the following:
   - a research-led set of aims and objectives;
   - a programme for the archaeological works;
   - a mitigation strategy for significant archaeological deposits;
   - a strategy to communicate the progress of the archaeological investigations to the general public;
   - a programme of public outreach for the duration of fieldwork;
   - specification for post-excavation assessment of any archaeology; and
6.0 The impact of maintenance tracks

6.1 The Trust had initial strong concerns about the proposed access tracks within the scheme. The Trust was concerned that additional hard surfaced roads would be detrimental to the setting of the North Hinksey Conservation Area and the Green Belt. It is considered that the improved design of these tracks and to downgrade them has served to negate the concerns. The Trust does seek assurances, and conditions to the permission if necessary, that ensure that these tracks remain suitable to their Green Belt and historic location. Additionally the Trust requests that the ‘hard standing’ areas – particularly adjacent to the Willow Walk Bridge – are also of a grass covered ‘green’ nature to protect the Green Belt and Conservation Area setting. The stipulation of ‘Grasscreet,’ or similar, around the bridges would ensure compliance with the landscape and heritage polices as listed above.

7.0 The ongoing maintenance of the new channels

7.1 Finally, the Trust, as a land owner is concerned that the life span of the scheme is 100 years, and yet there is only a maintenance plan for between 5 and 15 years. The exact details are somewhat ambiguous as demonstrated on page 17 of the planning statement:

“This plan details the 5 year management and establishment of the landscape and habitats associated with the scheme. It provides further details for the following 5 to 10 years and principals for the longer term management.”

7.2 The Trust believes it necessary that there is a condition placed on any potential permission for a longer maintenance plan. It is reasonable that the appropriate body – the Environment Agency – remains in charge of the maintenance of a technical works for its lifetime, which is predicted to be 100 years. Furthermore it is the moral imperative as a responsible land owner that the scheme remain in good working order and the Trust does not have the expertise to provide this role. In discussion with the applicant, they have indicated that conditions of this type and length are not unheard of. The Trust believes that because of the unique nature of this scheme and its particular sensitivities a particular condition is reasonable and proportionate.

8.0 Conclusion

8.1 In conclusion, the Trust believes that complementary measures, such as the dredging and maintenance of the existing watercourses must be a central part of the overall scheme. Conditions should be applied to the water courses within the area under consideration in this application, to ensure that this happens as part of the overall maintenance. The Trust also suggests that further work could be undertaken by the EA to understand the benefit of watercourse improvements outside of the area under consideration in this application.

8.2 The Trust further considers that the public benefits of the scheme – whilst clear in terms of flood management – do not deliver in terms of access to the countryside and preservation of the built and natural environment. Also, the harm to the Green Belt and the Conservation Area of North Hinksey has not been properly considered and the design of the bridges should be reviewed. The Trust suggests that a bespoke bridge design that celebrates, conserves and enhances what is special about Oxford would be more appropriate than what is proposed. Inspiration could be taken from the Rainbow Bridge in the University Parks. The Trust suggests that a design review of bridge concepts should be carried out and submitted in support of the application or made a condition of the permission.
8.3 The Trust is concerned that the number of trees to be felled is not clear as many are described as ‘groups of trees’ so the true number is many hundreds. The Trust asks that this is reviewed to ensure that the numbers removed are kept to a minimum. Any replanting should include one White Willow and Black Poplar – particularly on Willow Walk up to the proposed bridge. The suggested replanting does not take into account the character of Hinksey Meadow as a heritage asset or its biodiversity importance. The Trust objects to planting trees without this full understanding and requests that this is reconsidered, particularly in relation to the ‘Jewson land’, so that the chance of re-establishing MG4 grassland to compensate for its loss is increased. Compensatory grassland here instead of trees would also conserve the setting of the heritage assets and comply with the purposes of the Green Belt. The Trust also suggests that requirements for the maintenance tracks and hard standing to be ‘green’ to reduce the visual impact on the character of the Green Belt and Conservation Area.

8.4 As land owners with a long-term aim of preserving and enhancing the character and setting of Oxford, the Trust believes that issues relating to maintaining and increasing public access to nature, as the EA has committed to, and to the long-term future management of the flood channel need to be more fully and transparently agreed before a decision can be made.

8.5 Finally, the Trust must, once again, express its concern at the difficult nature of this application and the public consultation which has taken place around it which has led to local people being confused and unaware of what is planned, and the magnitude of it.

8.6 The Trust hopes that these comments are clear and helpful. Should you have any questions please use the contact details below.

Yours sincerely,

[Signature]

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