Dear Mr Harding,

**Proposed Oxford Flood Alleviation Scheme**

Further information required to support planning application and under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017

The consultation period on the above planning application has ended and we have received comments from a range of consultees. Copies of these have already been provided to you and they are available to view on our website. We require further information to support the planning application and in respect to the Environmental Statement before we can determine this application. This letter sets out the information which is required. Full details on specific requests can be found in the letter from the relevant consultee.

Some consultees have reported having difficulty in finding information within the large number of documents which comprise the submission. Consultees have specifically requested clearer plans to show the first and second stage channels, the bridges to be replaced and the temporary accesses and plans at a scale that makes it easier to understand the details.

**Further Information Required:**

**Noise and Nuisance**
The Environmental Health Officer at Oxford City Council has commented that no explanation has been provided regarding why operational impacts have been scoped out. Details of how this matter has been considered should be provided.

**Landscape**
Oxfordshire County Council’s landscape consultant has advised that the proposed level of tree removal should not be accepted unless it can be demonstrated that tree loss cannot be reduced. Therefore, consideration should be given to whether amendments can be made to the proposals to reduce the extent of tree removals. If this is not possible, further information should be submitted to demonstrate why the extent of tree removals proposed is necessary.

The following further information is requested with respect to landscape impacts

- A further assessment of the impact of the proposals on elevated views from the Public Rights of Way network to the west of the A34.
- Justification of the proposed extent of tree removals, including details of design alternatives which could secure the retention of a greater proportion of tree cover and reasons why these design alternatives were not taken forward.

- The landscape mitigation strategy may need to be reviewed should amendments be made to the proposed extent of tree and grassland removal.

- Further consideration should be given to the choice of materials and the appearance of engineered elements including weirs, flood walls, flood gates and abutments to ensure that these remain as recessive as possible and do not appear overly prominent.

- Further consideration should be given to reducing construction effects on MG4 grassland habitat, including limiting construction space in this area to preserve as much of the grassland at possible, and protecting those retained areas of grassland with suitable, temporary, fencing to prevent ingress by construction traffic.

Vale of White Horse District Council have requested further detail in the Landscape and Visual Assessment to help people understand the impact of the scheme, including the impact of tree removal and replanting on views of North Hinksey Village and the spires of Oxford.

**View cones**

Further information about the impact on the City Council’s view cones is required in order to understand the impact on the setting of the city.

Oxford City Council have recommended fully assessed CGI imaging, particularly from the western side where change will be evident and views are more sensitive.

A view from St Mary’s Tower should be considered as this vantage point is higher than others selected and a critical vantage point for viewing the landscape setting of the city to the south and west.

Raleigh Park and Hinksey Interchange have not been included in verified views. These view cones cover the central area of the scheme where the scheme would have the greatest impact, across the open meadows that provide the uninterrupted foreground to the city and its ‘dreaming spires’ and to parts of the city that offer potential for substantial change. Therefore, verified views are required to assess the impacts.

Further details of the requirements can be seen in the comments from Oxford City Council, Heritage and Urban Design

**Green Infrastructure**

Further information and clarifications are requested to confirm whether the opportunities identified in the Green Infrastructure Strategy have been adequately incorporated into the application proposals and that full account has been taken of the likely practicalities of delivering these opportunities in the final scheme. Specifically, the following clarifications are requested:

- The locations of the main informal routes used by cyclists and how these function as part of the wider cycling network
- Consideration of the constraints to delivering the Green Infrastructure enhancements described
- Consideration to the impact of increased access to Port Meadow on Oxford Meadows SAC
Assessment of the interaction between improved recreational access and maintaining sites of biodiversity importance
- The ES refers to additional recreational surveys being undertaken, these should be provided
- Clarifications on how the loss of recreation land has been assessed, including how the location of green space has been taken into account and the loss of connection due to the removal of community planted woodland
- Assessment of the short and medium-term health impacts on local communities arising from temporary and permanent loss of recreational land.

**Ecology**
Further information is required on the following:

- Environmental Action Plan - minor amendments are required (details are set out in the consultation response on ecology, provided by Sue Lawley)
- Details of the biodiversity net gain calculation.
- Proposals for managing potential negative results (including from fishing and pollution) resulting from removal of vegetation surrounding Kennington Pit.
- An annex to the Environmental Statement is required stating the name of the surveyor, their qualification and licence number (where applicable) for each of the ecological surveys.

It would also be helpful to have confirmation that species and habitat GIS data have been made available to TVERC and to have the Floodplain Meadows Partnership’s response to the updated hydrology models.

As noted by BBOWT, the following further detail is required:

- Further detail on the Landscape Masterplan Drawing to show what is proposed with regard to habitat retention, restoration or creation in the areas identified in the legend as ‘first stage channel’, ‘second stage channel’, ‘proposed habitat creation’, ‘temporary works area to be seeded’
- Further information on the Landscape and Habitat Management Plan drawings to show how the habitats would be created and managed in the short and long term, including consideration of the potential impacts of construction traffic on the compound areas,
- Mitigation scheme for invasive species should be outlined
- More detail is required on long term management including on how management responsibilities will be defined, details of infrastructure necessary for management, funding, public access, monitoring and enforcement.
- Further calculations should be carried out and submitted to demonstrate whether there would be a net gain in biodiversity.

As identified through public consultation, the following information should be provided:

- Consideration of the impact of the development on the true Malus sylvestris (European Crab Apple), including whether these would be destroyed, how rare this species is in the area and any necessary arrangements for mitigation, for example growing replacements from the same stock and replanting.

As requested by Vale of White Horse District Council, the following information is required:

- Details of the impact of the development on Egrove Park Meadow Local Wildlife Site.
**Flood Risk**
The Environment Agency (as consultee) have requested a revised Flood Risk Assessment to address the detailed points as set out in their email from Kerrie Ginns dated 14th June 2018 which you have seen and which is available on our website.

**Transport**
Information should be provided on how bus traffic will be prioritised at Seacourt Park and Ride. Details of mitigation for disruption to bus services during the closure of Old Abingdon Road are also needed.

A detailed assessment of the impact of the loss of spaces at Redbridge Park and Ride is required, including details of any mitigation proposed to overcome impacts. This should include an indication of timings and details of the number of spaces lost.

A list of proposed permanent maintenance accesses should be provided along with drawings to show access design and visibility splays. Clarification should be provided on whether the access to the A420 would be used by construction vehicles and what type of access this would be.

As much further detail should be provided as possible, regarding the routes of travel to sites used for relocation of excavated material.

**Transport – Highway Agency**
- Modelling should be undertaken and the results submitted to ascertain if there would be an impact on the A34 Hinksey Hill junction and A34 mainline in terms of capacity and/or safety.
- Further details are required regarding the operation of the field gate access to the A34/Parker Road roundabout.

The Transport Assessment is currently unclear as to the exact flows that can be expected at the A34 South Hinksey junction. Large numbers of HGVs joining the A34 near each other may cause safety concerns in terms of platoons. Given the proximity of the field gate access to the A34/Parker Road roundabout, Highways England would have concerns if there were any impacts to the capacity of this roundabout which could ultimately compromise safety on the A34 mainline.

**Archaeology**
The Oxford County Council archaeologist and Historic England have commented that the full scope of the mitigation required has not been provided in the ES. They have confirmed that this can be agreed post-consent. However, you may wish to provide this information prior to determination to avoid delays at a later stage.

**Heritage**
As requested by Vale of White Horse District Council have requested a revised Heritage Impact Assessment to assess:
• The age and time layering of views. The heritage value of trees in the views needs to be clearly ascertained and a deeper understanding of views provided such that a reasoned assessment and proposal methodology can be followed. This would best be provided in a sequence of historic map overlays with views clearly marked and which should cover the JMW Turner views and those once perceived by John Ruskin and his followers in North Hinksey
• Details of the case for tree removal and re-planting and the position of new planting
• Details on the network of routes crossing the proposal site and their significance including proposals for their retention, enhancement and appreciation

Rights of Way
The following additional information is required:

- Information regarding how long Temporary Traffic Regulation Orders will be required for.
- Clarification of why both a short and long diversion route is shown for public rights of way 320/14 and 320/16.
- Confirmation of the arrangements for footpaths 352/1, 352/2 and 353/3. It is not clear that these can be acceptably accommodated over the embankments. Further information should be provided to demonstrate that this would work, or details of alternative routes should be provided.
- The plan should be updated to clearly show what is proposed for all paths and to ensure that it is clear how diverted routes would link in with the routes not affected.

The rights of way team have also made a number of detailed comments on the proposed diversions of several routes, these comments should be considered and details of any amendments provided.

Long term management and maintenance
Natural England, BBOWT, the County’s consultant ecologist and others have requested further details about how the site will be managed in the long term. This information is required to allow the longer-term impacts to be assessed.

Arboricultural Information
The Arboricultural Method Statement (AMS), Tree Removals Plan (TRP) and Tree Protection Plan (TPP) should be updated so that they are consistent and refer to the most recent version of the proposal. Context should be provided on why specific tree removals are required. The plans should be checked for proposed tree removals outside of the red line boundary and updated as necessary to ensure tree removals that are needed to facilitate the development are included within the red line boundary. The Tree Protection Plan should be updated to show areas that require tree root protection and include descriptive text and details of the specification should be provided. The AMS and the TPP should be updated to provide details of the above soil surfacing. The documents should consistently reference the appointment of an Arboricultural Clerk of Works. Further detail on tree protection fencing is required. Further detail of mitigation planting is needed. Section 2.2 of the Arboricultural Impact Assessment on protected species should be updated. The details of the further arboricultural information required can be found in the consultation response from Wharton Natural Infrastructure Consultants. This also requests clearer plans showing the first and second stage channel so that the impacts can be fully understood.

Other issues raised during consultation

Bridge Design
A number of consultees, including OCC’s landscape consultant, the Urban Design team at Oxford City Council and Vale of White Horse District Council have expressed concern about the design of the bridges. I recommend that you consider whether the design and materials proposed for these structures could be amended to address the concerns, reflect the context and fit better with development plan policy aimed at ensuring high quality design and protecting
Oxford’s green open spaces and rights of way network. If it is not possible to amend the materials, consideration should be given to enhancing the design through incorporating public art.

**Amendments to planting**
I understand that Oxford Preservation Trust have made some suggestions about changes that they would like to see to the Landscape Masterplan, including a reduction in tree planting on Jewson’s Land to screening only, the planting of MG4 grassland on the remainder of this land and planting of trees and shrubs currently proposed for this area elsewhere within the application site.

Oxfordshire County Council’s Consultant Ecologist and Environmental Strategy Manager have confirmed that these changes seem reasonable in principle. If it is proposed to take these changes forward the application will need to be formally amended and the impact of the changes will need to be assessed.

Vale of White Horse District Council have requested that proposed planting is revisited so it better reflects the local landscape character and screens existing development particularly that on Botley Road. In particular, they support the planting of willow (Salix), alder (Alnus glutinosa), hazel (Corylus avellana) and small leaved lime (Tilia cordata), but not the planting of ash (Fraxinus excelsior) or sycamore (Acer pseudoplatanus).

**Avoiding pre-commencement conditions on any permission issued**
A number of consultation responses include requests for further information that is not needed prior to determination and can be required by pre-commencement planning condition. Should you wish to reduce the number of pre-commencement planning conditions you are encouraged to provide all information requested by consultees prior to determination so that it can be consulted upon and if satisfactory, be approved along with the other submitted documents, should planning permission be issued for this development.

**Notification of landowners and tenants**
Following the public consultation on the planning application, Ferry Hinksey Charitable Trust have stated that they own land affected by the application and were not notified about the submission of the application by the applicant. A tenant of the Ferry Hinksey Charitable Trust has also stated that they were not notified. These parties are clearly now aware of the application; however, Oxfordshire County Council will be holding a further consultation period when the further information is submitted further to the Regulation 25 request above. This could present an opportunity for the applicant to serve notice on any parties that were missed initially.

**National Planning Policy Framework (NPPF) Revisions**
As you will be aware, a revised NPPF was published on 24th July 2018. As the planning application was submitted prior to that, it refers to the 2012 version. It is recommended that you consider whether any amendments are needed to any of the planning application documents to reflect the changes to the NPPF, which is a material consideration.

**Submission format and next steps**
It would be helpful if you could submit all the further information requested at the same time, to allow it all to be consulted on at the same time. We will need this further information to be submitted in electronic format with each file size less than 10 MB so that it can be uploaded to our website for consultation. We also require one hard copy of the complete submission.
Following submission of the further information we will hold a further public consultation period and there would also be a lead-in period to get a report finalised and the item on the agenda for a Planning and Regulation committee. Forthcoming Planning and Regulation committee dates are:

- 29 Oct 2018 2.00 pm
- 10 Dec 2018 2.00 pm
- 21 Jan 2019 2.00 pm
- 4 Mar 2019 2.00 pm

I hope this is helpful, but please let me know if you require any clarification.

Yours sincerely

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