By Email: Mary.Hudson@Oxfordshire.gov.uk

29th January 2018

Dear Mary

OXFORD FLOOD ALLEVIATION SCHEME (OFAS): PLANNING APPLICATION RESPONSE - LANDSCAPE

Application Reference: MW.0028/18

RECOMMENDATIONS: NO OBJECTION SUBJECT TO CONDITIONS

Following on from my initial consultation response submitted in July 2018, I have now had the opportunity to review in detail the revised and addendum information submitted by the applicant, and am pleased to set out below my final observations and recommendations in relation to the proposed development.

Overview

I previously raised a number of concerns in respect of:

- The scope of the submitted visual assessment;
- Tree Removals;
- Loss of Important Grassland Habitat;
- Landscape Mitigation Proposals and Management;
- Landscape Mitigation and Management;
- Public Access;
• Design of New Bridges and Engineered Elements; and
• Setting of Historic Settlements.

I set out below my response to the revised information submitted by the applicant. These comments should be read in conjunction with my previous commentary dated 18th July 2018.

Kind Regards

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Senior Landscape Architect
**Scope of Submitted ES Landscape and Visual Assessment (ES LVIA)**

I welcome the additional information provided by the applicant in response to the initial consultation responses, and I acknowledge the inclusion of additional views and photomontages from the west. I am satisfied with the scope of the submitted landscape and visual assessment contained within the ES LVIA chapter, and acknowledge the findings of this ES LVIA as being a fair and accurate assessment of the likely landscape and visual effects.

It is clear that development of this scale and nature is likely to effect a degree of change within the receiving landscape and visual environment and this cannot be disputed; with the development giving rise to adverse effects of Major/Moderate significance during the construction phase and effects of Major/Moderate to Moderate significance at operation year 1, but reducing in some cases by year 3 (during operation).

These effects are, however, considered to reduce over time and through mitigation by operation stage year 15, with the ES LVIA identifying a reduction in the overall significance of effect to one of Moderate to Minor significance. The assessment goes on to note that by operation stage year 15 many of these adverse effects will be beneficial, making a positive contribution to the site and its setting.

It is clear, however, that the proposed mitigation measures are integral to the successful integration of the flood alleviation scheme into the receiving landscape.

Consideration should also be given to the context of these proposals. On one hand the site and surrounding area form part of the historic landscape setting of Oxford, acting as a foil to the ‘Dreaming Spires’ a landscape which should be respected and, where possible, protected.

On the other hand, this is a landscape of clear juxtapositions, with the floodplain pastures and green open space of the site and its setting sitting in stark contrast to the urban areas of Botley, Osney, North Hinksey and the western extent of the wider urban area of Oxford. This is also a landscape which is traversed by major road and rail corridors and which is influenced by the industrial and commercial land uses that are typical of these urban edge locations.

Within this context, the introduction of the flood alleviation scheme will constitute a perceptible change. It is, however, the construction process, initial operation stages (years 1 and 3) and initial vegetation removal that is likely to render the most significant adverse effects of Major/Moderate to Moderate significance. However, once completed, and subject to the appropriate management of the proposed mitigation measures, the completed flood alleviation scheme will be a largely green and visually recessive introduction to the landscape by operation year 15.

Of course, features such as the proposed bridges and flood walls etc. will be evident, but they will be seen within the context of the wider urban area, and as a minor part of this open and ostensibly green site.
It is my view that the assessment of effects contained within the submitted ES LVIA Chapter and subsequent addendum submission, in relation to the landscape visual impact of the development is sound, and agree that in time, the proposals can be successfully integrated into this context.

I would, however, caveat that by stating that the successful integration of the proposals into the receiving visual environment is intrinsically linked to the successful management and establishment of the proposed mitigation planting, and I provide further consideration in this respect below.

**Tree Removals**

I previously noted my concerns in respect of the scale and extent of the level of tree/vegetation removal necessitated by the proposals. The applicant has, following a request for further information, provided a revised arboricultural survey and Arboricultural Impact Assessment (AIA). This assessment sought to reduce tree losses within the working area of the scheme, and clarifies the extent of tree removals across the Site.

Having considered the revised information provided by the applicant, I maintain my concerns as to the extent of tree cover across the site, noting that despite the reduction in tree losses and the assurance by the applicant, this will still represent a significant adverse impact in landscape and visual terms. I am satisfied however, that the applicant has demonstrated that suitable alternatives have been explored, and that the current proposed channel arrangements represent a balance between the various constraints affecting the site.

I do however, have a number of further comments and recommendations for consideration.

**Tree Removals**

For ease of reference the revised information provided by the applicant, identifies that proposals will necessitate the removal of circa. 2000 trees in total, comprising 284 individual trees, 45 groups and 63 partial group removals.

I also acknowledge the applicant’s commitment to reducing these removals further during the construction process, noting “If it becomes clear that the contractor can work around trees that have been identified for felling without damaging them they will be retained. An environmental clerk of works will be on site and work alongside the contractor to make sure that these further opportunities are identified and taken wherever possible”.

Further consideration should be given to the phasing of all tree removals on site so as to avoid the wholesale loss of vegetation at the start of the construction period. This would help to preserve the character of the site and its setting and help to mitigate those significant landscape and visual effects identified within the submitted ES LVIA.
Details in this respect could be the subject of further discussion and secured by condition should permission be granted.

**Replacement Planting**

I note that, the proposals seek to mitigate for the tree loss by planting 4325 trees, including 4100 trees within areas of proposed mixed deciduous woodland and 225 individual trees, which will in the long term make a positive contribution to the receiving landscape and visual environment.

I also understand, a further 15,000 smaller tree species, such as hawthorn, hazel and elder will also be planted within the proposed woodland areas and on the woodland edges, alongside many more native shrubs such as dogwood, goat willow, dog rose and wild privet.

I understand the selection of species has been considered in order to reflect those species that are found growing locally and which are understood to thrive in the existing/predicted ground conditions. While this aspiration is noted, I see opportunities for potential improvements to the planting specification and design throughout the site, including the provision of additional replacement tree planting within the northern parts of the scheme and in the vicinity of West Way/Botley Road and Seacourt Park and Ride where a significant amount of tree cover is to be lost.

This could be subject to further discussions and condition should permission be given.

Further consideration should also be given to the inclusion of advance planting, where appropriate, and the phased installation of planting throughout the construction process to ensure that new planting is able to mitigate the loss of tree cover from the outset.

Again, this could be subject to further discussions and condition should permission be given.

**Mitigation and Long Term Management of New Planting**

Whilst the extent of new and replacement planting detailed above will successfully mitigate the loss of tree cover in the long term, it will be some time before this becomes the case. Indeed, the applicant notes within their response to the Regulation 25 Request that:

“*The replacement woodland trees will be saplings and it will be many years before they have the same ecological value as those being felled*”

The success of the proposed mitigation planting is therefore predicated on the successful long-term management of the site as a whole, and I note that the applicant at section 7.4 of the Environmental Statement, states:
“Mitigation planting measures will be subject to establishment maintenance and management for a period of 25 years following implementation (dependant on landowner agreement where located on private land)”

Given the scale of the development and the complexity of the habitats the proposals seek to provide in mitigation of the development, I believe an early agreement of the long-term management procedures for this 25 year period should be agreed from the outset, so that the long term viability and effective management of this planting can be secured prior to works taking place on site.

**Loss of Important Grassland Habitat**

I acknowledge the additional clarification provided by the applicant with regard to the important MG4a grassland at Hinksey Meadow which is an important feature within the historic landscape setting of Oxford. I understand that the applicant has sought to minimise the removal of this habitat as far as possible; limiting this to the removal to circa. 2 hectares. I also note the applicant’s commitment to provide circa. 17.4 ha of replacement MG4a floodplain meadow in compensation for this loss.

For reference the submitted assessment identifies the loss of this grassland habitat as resulting in an adverse effect of Major/Moderate to Moderate significance at operation year 1, reducing to one of negligible significance at operation year 15, with the proposed mitigation measures considered sufficient to mitigate this loss.

However, and as previously stated, this grassland cannot be readily recreated and it remains the case that its loss cannot be easily rectified through replacement planting and reinstatement as the Landscape Mitigation Strategy suggests, and certainly not within the 15 year assessment timescale covered within the Environmental Statement.

The long-term management of the replacement MG4a habitat is covered within the Landscape and Habitat Management Plan (LHMP) which the applicant has updated to reflect the revised tree removals. It is clear however, that the establishment of the replacement MG4a habitat, to a point where it meets the biodiversity and value which presently exists at Hinksey Meadow, cannot be achieved within the 15 year assessment time frame covered within the Environmental Statement. Nor could it be secured during the 25-year long-term management plan which the applicant seeks to agree in due course.

Landscapes and habitats of this nature take time to develop and mature into the biodiverse habitat resource which currently exists at Hinksey Meadow. The concern here is that the management period for these areas would need to extend beyond the maximum 25 year period referenced within the submission, if this habitat is to develop to a point where is compensates for the loss of existing MG4a Grassland at Hinksey Meadow
Further discussion and consideration is required with respect to the length of the long-term management period, to ensure that suitable measures are in place to secure this as a viable compensatory habitat.

**Design of New Bridges and Engineered Elements**

**Bridges**

Having reviewed the revised information submitted by the applicant in respect of the proposed vehicle and footbridges, I am satisfied with the applicant’s response with respect to the siting, size/scale and appearance of the proposed bridges. I am confident that the alternative palette of materials specified by the applicant, including the use of CorTen steel uprights as opposed to galvanised steel to the proposed parapets and the use of buff coloured limestone to the abutments of these bridges, will ensure that these features will appear visually recessive and will blend into the receiving landscape and visual environment.

These alterations will ensure, that while still visible within the landscape, the proposed bridges will not appear overly prominent, with the recessive nature of the CorTen uprights and timber handrails, helping to integrate the proposed bridges into the landscape. By operation stage year 15, once the proposed mitigation planting has established and matured, the bridges will benefit from a further level of integration, reducing the overall significance of effect, and as such I am confident that these features can be integrated into this context.

**Other Engineered Elements**

The introduction of proposed engineered elements throughout the scheme (weirs/flood walls/flood gates/abutments etc), but particularly within the southern section of the scheme close to Abingdon Road, Kennington Road, and A423 close to Redbridge Park and Ride remains a concern.

Accepting the need for these features as part of the effective management of floodwater, and that the design and location of these features has been set by both the requirements of the scheme, it is therefore imperative that the design and appearance of these features is appropriate for the context in which they are set.

The applicant, notes: “In order to integrate these structures quickly and sympathetically to their setting, their finishes have been carefully considered. As such the grass species to seed the earthen embankments have been chosen to ensure they blend with other established grassland in the semi-urban environment they are located. Similarly, we have selected materials for the flood walls to reflect the vernacular architectural style that predominates in the areas they are situated. For example, red engineering brick with a contrasting blue coping laid in an English garden wall bond for flood walls at
Botley Road and Kennington village, and a buff limestone coursed rubble construction for South Hinksey village to help these structures blend into their semi-urban setting”.

These measures seem appropriate within this context, reflecting the local vernacular where appropriate and promoting a sensitive, and visually recessive palette of materials within setting of South Hinksey village. It is clear that these features will remain visible during the initial operational phases (years 1 and 3) but I am confident that they can be successfully integrated into the landscape by operation stage year 15, subject to the appropriate management of the proposed mitigation measures.

Setting of Historic Settlements

As I previously noted, I share the concerns of the Friends of North Hinksey Village and the Oxford Preservation Trust in that the development will undoubtedly alter the character of the setting of these settlements and associated Conservation Areas, particularly during the construction process and early operational stages (years 1 and 3).

The proposed mitigation strategy will undeniably assist in mitigating this impact, however, replacement planting will not make a significant contribution in terms of mitigating this impact until after the 15-year assessment timeframe covered in the ES LVIA chapter, and is dependent on good, long-term, management.

As noted above it is therefore important to ensure that the long-term management and maintenance of the proposed mitigation planting is secured from the outset so as to ensure that replacement planting, (either individual specimens, or as woodland blocks) is given the greatest opportunity to establish and mature to mitigate this loss.

Alongside the phased removal of planting during the construction process and the installation of advance planting prior to commencement of removals, this will ensure that those adverse effects upon the landscape setting of North Hinksey Village are moderated in the short term, and successfully mitigated in the long term.

Conditions

Should the County Council approve the application then I request that a number of key conditions are included as follows:

A. Condition: Prior to the commencement of the development and notwithstanding the information submitted to date, full details of all proposed mitigation measures, including details of all tree, shrub, hedgerow and habitat enhancements, including advance planting where applicable, shall be submitted to and agreed in writing by the County Council. This will include details of species, plant sizes and numbers/densities, the identification of existing
trees and shrubs to be retained (noting species, location and spread) and an implementation programme.

Reason: to ensure the successful implementation of appropriate replacement planting across the site.

B. Condition: Prior to the commencement of the development and notwithstanding the information submitted to date, a detailed long-term management plan for a minimum period of 25 years shall be submitted to and agreed in writing with the County Council. This will build upon the information provided within the Landscape and Habitat Creation - Delivery Management Plan, and is intended to secure the long-term management and established of all proposed landscape areas and replacement habitat.

Reason: to secure the long-term establishment and management of all proposed landscaping and replacement habitat, and to secure net gains for biodiversity.

C. Condition: Prior to the commencement of the development, details of the provision of advance planting throughout the scheme/site area shall be submitted to and agreed in writing by the County Council. This information will identify potential locations, the extent of and specification of all new planting, which could reasonably be implemented prior to the commencement of works on site.

Reason: In the interest of visual amenity and to preserve the variety of habitat across this site prior to the commencement of construction works.