

HOW TO READ AND COMMENT ON THE REVISED PLANNING APPLICATION FOR THE OXFORD FLOOD ALLEVIATION SCHEME

You need to comment by 17 April 2023!

How to read the planning application

The revised application for the Oxford Flood Alleviation Scheme (OFAS) is at <https://myeplanning.oxfordshire.gov.uk/Planning/Display/MW.0027/22#undefined>. Scroll to the bottom of the page, click 'accept', and on the next page click 'documents'. There are more than 450 documents, some of which are more important than others, which is why this little guide has been put together.

The Environment Agency has provided [information additional to the original planning application](#). This information needs to be read *in addition to* the original application. The main new information is about 'biodiversity net gain' and alternatives to OFAS. It does not allay any previous concerns about the scheme's impacts which led to Oxfordshire County Council asking for more information.

Overview: A revised [general scheme overview](#) shows the components of the scheme in operation. More detailed diagrams of the 3-4 year scheme construction are at:

- [North of Botley Road](#)
- [Hinksey Meadow](#)
- [North Hinksey village, Osney Island](#)
- [New Hinksey](#)
- [South Hinksey area](#)
- [South Hinksey to Kennington Road](#)
- [Kennington](#)

Revised maps show the [extent of flooding](#) with and without the OFAS under various scenarios.

The [environmental statement](#) (ES), an [ES addendum of March 2023](#), and a [non-technical summary](#) are the main reports that discuss the impacts of the scheme. The ES includes some [visualisations of what the completed scheme will look like](#).

A revised Appendix Q considers '[no channel](#)' alternatives, keeping other elements of OFAS. It shows that the proposed scheme would cost £24 million more than if there was no channel, whilst protecting only 51 extra homes in a 1-in-50 year flood (157 in a 1-in-100 year flood). A new Appendix U explains [different channel routes](#) that were considered during the design of OFAS.

Traffic: Table 11.3 of the ES shows that excavating the channel would lead to [almost 200 HGV movements per day](#) for 3-4 years:

- Into/out of the Botley Road at the Seacourt Park & Ride: 36/day
- Into/out of South Hinksey at the north end of the village: 144/day
- Into/out of Abingdon Road: 14/day

Page 244 of the environmental statement notes that a [40mph speed limit on the A34](#) would be requested between the Botley Interchange and a point south of South Hinksey. To prevent completely unacceptable queues at the Hinksey Hill interchange, Sec. 4.2.4 of the transport assessment proposes that a [20mph temporary carriageway will link Kennington Road and Old Abingdon Road](#).

Although the Environment Agency plans to submit a separate [planning application to build an access track to the railway line](#) to allow some material to be removed by rail, this depends on the sidings and track capacity being available which is uncertain. The planning application does not refer to this.

Biodiversity: Table 8.8 of the ES explains that the OFAS would result in the [loss of 3.1ha of Hinksey Meadow](#), of which 1.33ha is rare MG4a grassland (about 1% of all the remaining MG4a grassland in England and Wales). Appendix C-5 of the ES explains that the OFAS would probably [dry out the rest of Hinksey Meadow](#) to the point where the plants that make it a rare MG4a grassland would no longer be able to survive. In other words, the OFAS would indirectly affect the whole of Hinksey Meadow.

The OFAS proposes to [create new sites of MG4 grassland](#) (also see Sec. 8.3.2 of the [ES addendum](#)) but the ES notes that “Habitat creation and translocation are not a substitute for in situ conservation of this kind of habitats, the latter approach always being preferable where possible”.

The scheme must show at least 10% ‘biodiversity net gain’. *Not even considering the loss of Hinksey Meadow where translocation is used as a ‘bespoke measure’*, and despite all the new water features, OFAS will cause a [1% loss of habitats on site](#) because the existing habitats are already of high value. The legally-required ‘gain’ would be done through off-site planting, but at unspecified locations.

Table 8.8 of the ES also states that [most of the pond at Kennington Pit Local Wildlife Site will disappear](#). Table 7.4 of the ES explains that [most of Kendall Copse will be lost](#). The scheme would also affect [otters](#), [bats](#), [water voles](#) and other species in the area.

Visual: The ES shows few photomontages of what the scheme will look like. Figure 7.12 shows the [loss of trees at the Seacourt Nature Reserve](#). Figure 7.21 shows that the proposed [bridge at Willow Walk would be enormously wide and paved](#), more like an airport runway than a pedestrian and cycle track: Sec. 7.1.7 of the [ES addendum](#) misleadingly shows only part of the same bridge. Figure 7.35 shows what the [Devil’s Backbone](#) would look like.

Cumulative: Cumulative impacts are impacts that individually are minor but together are major. The OFAS would have some significant cumulative impacts:

- Loss of 2000 trees in the area (Table 7.5 of the [ES](#))
- [South Hinksey is encircled by construction compounds and access routes](#) for 3-5 years
- Loss of recreational access to much of the area during construction (Sec. 6 of the [ES](#))
- [Minor increases in air pollution](#), particularly on the Botley Road

How to comment on the revised planning application

You may have commented on last year’s application. Please also send in comments about this revised application to <https://myeplanning.oxfordshire.gov.uk/Planning/Display/MW.0027/22#undefined> and/or Matthew.Case@oxfordshire.gov.uk.

Please be clear about whether you are opposing or supporting the OFAS. If you support the idea of flood alleviation but oppose this scheme (e.g. because its impacts would be too severe), please

oppose this scheme but write that! If your points from last year are still valid, please write that. Points that are likely to have particular resonance¹ are:

- Harm to the Hinksey Meadow and Kennington Pit Local Wildlife Sites².
- Unacceptable impacts on traffic on the A34, including a 40mph speed restriction and uncertainty about the effectiveness of a temporary bridge at Kennington
- Harm to people's health, particularly in South Hinksey, from noise, vibration, dust and air pollution.
- The fact that the proposed scheme does not follow the 'mitigation hierarchy' of first avoiding impacts (e.g. no channel through Hinksey Meadow), then mitigating (narrower channel) and then compensating (trying to create new sites). A 'no channel' option would avoid most of the OFAS impacts.

¹ These points relate to the planning framework that Oxfordshire County Council and the Vale of White Horse District Council must follow, i.e. the Oxfordshire Minerals and Waste Local Plan, the Vale of White Horse Local Plan, and the National Planning Policy Framework

² Hinksey Meadow is an irreplaceable habitat. The [National Planning Policy Framework](#) states (para. 180) that *"development resulting in the loss or deterioration of irreplaceable habitats... should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists"*. A footnote gives as examples of 'wholly exceptional reasons' *"infrastructure projects (including nationally significant infrastructure projects, Transport and Works Acts and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of that habitats"*. However such projects have different planning regimes and would not be decided by a local authority; the benefits to 50-160 privately owned dwellings do not clearly outweigh the loss of the meadow; and there are alternatives to OFAS that would not involve destroying it.