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10 March 2023

Matthew Case
Planning Department
Oxfordshire County Council
County Hall
New Road
Oxford OX1 1ND

Dear Mr. Case,

Re. Objection to planning application MW.0027/22 including Regulation 25 information

We again **object to the channel component of the Oxford Flood Alleviation Scheme**. Our main objections of March 2022 related to the fact that the channel would:

- **Destroy 1.33ha of irreplaceable MG4a grassland** at Hinksey Meadow, and potentially dry up the rest of the meadow, which represents about 2% of the remaining 1500ha of MG4a grassland that still exists in the UK.
- Have a lower benefit-cost ratio (10.6) than a no-channel option (12.4). The channel itself would reduce flooding at only 51 additional dwellings in a 1-in-50 year flood, at a cost of £24 million, i.e. £470,000 per dwelling. The channel would essentially be **heavily subsidising a few households at a cost to everyone else**. The channel thus **provides extremely poor value** at a time when the use of public funds (especially in the South of the country) is being tightly scrutinised.
- Lead to **240 HGV movements per day** to carry the spoil from digging up the channel, most on the already extremely-busy national A34 route – which already has a high rate of accidents and congestion. **Traffic on the A34 would need to be slowed from 60mph to 40mph** around South Hinksey to allow the slow lorries to get onto the road. The A34 would also be cumulatively affected during construction of the scheme by traffic from the large housing developments going up around Oxford.
- Mean the **loss of recreational access to most of the area** during the 3-5 years of project construction, and permanent loss of recreational access to most of Seacourt Nature Park, which would not be adequately compensated by land to the south of Jewsons because this is already publicly accessible.

The proposal has also **not followed 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.

More minor objections concerned the loss of 2000 mature trees; the loss of willows on the east side of Seacourt Stream; potential impacts to otters and badgers; the brutalist, over-wide footbridge at Willow Walk; air quality issues on the Oxford Ring Road at Botley, where NOx emissions already exceed legal standards. None of these concerns has been assuaged by the Regulation 25 information.

Since last April, additional issues have arisen:

The biodiversity net gain calculations for the scheme show that, *not even including Hinksey Meadows, and despite the much-vaunted increase in wetland habitats that the channel would bring¹*, there will be a **biodiversity net loss on site**. The only way that the legally-required 10% biodiversity net gain can be achieved is by planting off site, at yet-undisclosed locations. This has changed from the previous environmental statement only because local residents have highlighted the biodiversity importance of the fields between North and South Hinksey.

We do not agree that OFAS has exceptional reasons which outweigh the irreplaceable nature of Hinksey Meadow. Section 3 of the new Appendix U to the environmental statement suggests that there are exceptional reasons for OFAS:

“Table 8.2 of the ES confirms that Hinksey Meadow is considered to be an irreplaceable habitat. The NPPF at paragraph 180 (c) states ‘development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists’. The footnote to this, footnote 63, explains ‘For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.’ Our scheme is one such infrastructure project where we believe the public benefit outweighs the impact on Hinksey Meadow.”

We disagree. We wrote to Michael Gove MP last year, asking him to call in OFAS for a determination as we felt it has national-level implications (Hinksey Meadow, A34, poor value for money). Mr. Gove responded saying that he feels that OFAS is a local-level project that should be determined locally. The kinds of projects listed in footnote 63 of the NPPF are of national scale; subject to different, national-level planning regimes; and are in some cases subject to Parliamentary oversight. So either OFAS is a local-level project without exceptional reasons that would outweigh its impact on an irreplaceable habitat; or, if it has exceptional reasons, it should be subject to national-level decision-making, especially given its severe impacts.

The Oxford Low Traffic Neighbourhoods will push **more traffic onto the ring road**, exacerbating the cumulative impacts of traffic on the road.

The cost of the scheme has been increasing, and will continue to do so, making its **viability and benefit:cost ratio increasingly questionable**. The 2017 Outline Business Case had the cost of the scheme as £111 million. The 2019 business case had the cost at £154 million. In July 2022 the Environment Agency (email from Ross Lewis, 19 Aug 22) stated that the scheme cost was £176 million. That number is still used in the CPO and planning information for the scheme. The cost will undoubtedly rise again because of the increased cost of energy and materials. HS2 is being delayed because of this. These likely increases further affect the economic arguments for the channel option.

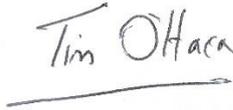
The scheme’s **severe local recreational and transport impacts** have been highlighted. The three-month closure of Willow Walk (Jan – April 2023) for replacement of a bridge have shown just how heavily-used that path and other nearby footpaths are. For instance, many students at Matthew Arnold School, who previously cycled on Willow Walk, are now either cycling along the busy, unsafe

¹ “The scheme will create new wetland habitat. Wetland habitats support plants and animals adapted to living in a wet environment and are in decline across the country. Creating over 20 hectares of new wetland and around 16 hectares of floodplain meadow throughout the area will be a valuable benefit of the scheme.” From <https://www.gov.uk/government/publications/oxford-flood-scheme/oxford-flood-scheme>.

Botley Road, or are being driven to school. The OFAS proposal would involve *three years of footpath closures on a much wider scale*: these are severe impacts on many local residents.

In conclusions, **we would support Option A2 (OFAS minus channel)** as described in Appendix Q of the environmental statement. However **we strongly oppose the channel component of the scheme** and thus the current planning application.

Yours sincerely,

Handwritten signature of Tim O'Hara in black ink, written in a cursive style.

Tim O'Hara

Handwritten signature of Riki Therivel in black ink, written in a cursive style.

Riki Therivel