


Oxford Core Strategy Examination Statement of Oxford City Council		 www.oxford.gov.uk
C/M9/3	Matter 9 – Climate Change Issue 3 – Flooding	

i) Does the plan’s approach to flood risk accord with guidance in PPS25, particularly in respect of the sequential and exceptions tests?

The approach to flood risk set out in the Core Strategy follows the guidance set out in PPS25 (CD11/16) as it indicates that the suitability of development proposals will be assessed according to the PPS25 sequential and exceptions tests. It also requires the submission of Flood Risk Assessments (FRA) in accordance with PPS25.

With regard to the allocation of land in the LDF, a sequential test has been undertaken in relation to housing numbers. This sequential test is found within the background paper – Responding to Flood Risk. To summarise, briefly, Oxford does not have enough sites (as identified in the Strategic Housing Land Availability Assessment (SHLAA) (CD15/1) within Flood zones 1 or 2 to meet the South East Plan (CD10/1) housing requirements. Therefore, in accordance with the guidance within PPS25, sites in flood zone 3a have to be included as potential locations for housing land. A full sequential test of all potential sites will be undertaken for the Site Allocations DPD. The exceptions test will need to be carried out in relation to any allocations of housing land that occur within flood zone 3a.

ii) How has the SFRA influenced the spatial strategy?

The SFRA (CD15/1) was published in September 2008. For a long time, the issue of flooding has been a major constraint to development within Oxford. The SFRA confirmed what Oxford City Council already knew about flooding. Ultimately there proved to be very few practical differences between the already published Environment Agency Flood Maps (which took account of solely fluvial flooding), and the SFRA, which took account of flooding from all sources.

The issue of flooding has influenced the spatial strategy, particularly the selection of the strategic sites. The river corridors of the Thames and the Cherwell are also protected in the Core Strategy, with the focus for development being on brownfield sites wherever possible. The strategic sites are all predominantly in flood zone 1, with only small areas of Barton, and Summertown in higher flood zones. The West End is a regeneration zone as discussed in PPS25 (see para. 4.16 and 4.35). This satisfies the first two strands of the exceptions test – that the site is required for sustainability reasons (i.e., regeneration) and that it is predominantly previously developed land.

iii) Is the SFRA based upon the most up to date information?

Yes. The Oxford City Council SFRA was based on the most up-to-date information available. Section 4.4 of the SFRA explains how the flood zone map was updated. Section 4.4.1 of the SFRA explains that the Environment Agency undertook hydraulic modelling studies within the Thames catchment, specifically within Oxford. The Wolvercote hydraulic model (OX_05.dat) was developed by the Environment Agency. From it the 25, 100 and 200 year events were generated for the purposes of the SFRA.

The water level data that has been provided by the Environment Agency originates from the Wolvercote Model referenced OX_05b.dat, dated May 2006. The outlines generated from the Wolvercote model were verified against previous flood risk mapping data for the river Cherwell, historic flood outlines available from the Environment Agency, and the published Flood Map. This information was the most up to date at the time the SFRA for the Oxford Core Strategy was produced.

iv) Should the plan be more specific as to what is required to avoid unacceptable flood risk?

Policy CS12 provides the general approach to be taken with regard to flooding within the City. In a constrained city such as Oxford, development within the higher flood zones for more vulnerable uses is very likely since Oxford's available land for allocating sites is less than the regional housing targets. It is anticipated that Flood Risk Assessments for individual developments will address the majority of flood related issues. Development on sites within flood zone 3a for more vulnerable uses will need to satisfy the requirements of the Exceptions Test, particularly with regard to safe access. It is likely that this will be undertaken as part of site specific Flood Risk Assessments.

One area of the City - the West End - has been the subject of continued discussions with the Environment Agency. Since the adoption of the Area Action Plan (CD7/5), in the representations to the Core Strategy, the Environment Agency stated that the Infrastructure Policy (CS.18) is inconsistent with PPS12 (CD11/11) because it fails to provide strategic infrastructure needed for key development sites to have "safe access and exit routes". An agreement in principle has been reached, although the details not finalised, that the best way to progress the site forward is through a Flood Risk Management Plan (or something similar in nature).

Letters documenting the latest position reached with the Environment Agency can be found appended to the Written Statement for the West End.

v) Should the plan include more detailed mapping and information?

The SFRA (CD15/1) contains an appropriate amount of information for the Core Strategy – particularly for the allocation of strategic sites. The Environment Agency, as part of their representations, stated that they wished to see more information regarding groundwater in the SFRA. The issues that were raised by the EA regarding groundwater will be addressed through an addendum to the SFRA which will include additional maps.

Representations have also been made with regard to sewage flooding from New Marston Residents and information relating to sewage flooding within the Oxford SFRA. The SFRA currently states that Thames Water had been consulted and had not identified any known flood risk issues within Oxford. This sentence had been carefully worded. Thames Water had been contacted as part of the production of the SFRA with regard to sewage flooding. Thames Water provided records of sewage flooding by postcode sector within Oxford. These records show where incidences of sewage flooding have occurred by postcode sector. Because the records are shown over such a wide area, it is not possible to identify known sewage flood risk issues within the City.

Oxford SFRA includes most of the information necessary for the level 1 assessment as described in the PPS25 companion guide. A great deal of the representations from the New Marston Residents Association refer to a level of detail that might be better suited to a level 2 flood risk assessment. The AAP for Barton will consider flooding through its area based flood risk assessment. This further work is likely to include an assessment of the utilities infrastructure as well as drainage and sewage assessments.

Finally, it is worth noting that the submission Proposals Map includes minor changes to areas of flood risk based on the information derived from the SFRA.