

marked up below - some reps mainly appear to be comments,  
 some flag particular concerns which have been marked specifically as soundness issues - all to be dealt with via SoCG conversations  
**Environment Agency comments on Chapter 8 –Development Sites, Areas of Focus and Infrastructure** **19/01/2024**

Site policy	Site name	Site Constraints: Flood Risk, Groundwater and contaminated land, Biodiversity and Ecology	Policy requirements	Opportunities	Points to clarify
SPN 1	Northern Gateway	FZ 1 Railway running along west side. Bedrock Unproductive aquifer, Secondary A Superficial aquifer. Presence of an investigated site. Wolvercote Mill stream approx. 470m west of the site.	<p><b>Ground water protection</b> -This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use.</p> <p><b>Ecology and Biodiversity</b>- We would look for reassurance that additional protective and enhancement measures are in place for river and its corridor, opportunities exist for the creation of an effective ecological buffer zones (minimum 10m from bank top) with the possibility of removing significant hard surfacing and this should be a critical part of any development brief. The scheme should avoid creating new crossing points on the watercourse where possible but where necessary a clear span bridge designed to minimise impact on the ecology of the corridor should be included.</p>		
SPS 1	ARC Oxford	FZ 1. Boundary Brook approx. 565m north west of the site. Bedrock Secondary A aquifer. Presence of an investigated site.	<p><b>Ground water protection</b>- This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use.</p>		

<p><b>SPS 2</b></p>	<p><b>Kassam Stadium and Ozone Leisure Park</b></p>	<p>FZ 1, 2 and 3 (3b).  Northfield Brook runs alongside to northern boundary of the site.  Bedrock and Superficial Secondary A aquifers.  Presence of an investigated site.  European Water Vole</p>	<p><b>Flood risk</b> - Majority of the site is in FZ1. More vulnerable development to be located in FZ1. 10m buffer zone included. Dwellings shall not be located in 3b. Level for level compensation should be provided for any loss of floodplain storage in design flood event, to ensure development does not increase flood risk elsewhere.</p> <p><b>Ground water protection</b>- This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use.</p> <p><b>Ecology and Biodiversity</b>- We would look for reassurance that additional protective and enhancement measures are in place for the Northfield Brook and wetland restoration and that ecological buffers zones (minimum 10m from bank top) are included in the development brief. Any development should also assess and take account of hydrological and connectivity issues that could be impacted by work in the corridor of the main river and should avoid any new crossing structures on the Northfield Brook.</p>	<p>Locate buildings in FZ1. Opportunity to engage with West Oxfordshire on their neighbouring strategic site STRAT11 and possible masterplan. Can you provide betterment</p>	
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SPS 3	<b>Overflow Car Park at Kassam Stadium site</b>	FZ 1, 2 and 3 (3b). Northfield Brook runs adjacent to southern boundary of site. Bedrock Secondary A aquifer. European Water Vole.	<p><b>Flood risk</b> - Majority of the site is in FZ1. More vulnerable development to be located in FZ1. Includes a 10m buffer. Dwellings shall not be located in 3b. Level for level compensation should be provided for any loss of floodplain storage in design flood event, to ensure development does not increase flood risk elsewhere.</p> <p><b>Ecology and Biodiversity</b>- we would look for reassurance that additional protective and enhancement measures are in place for the Northfield Brook and wetland restoration and that ecological buffers zones (minimum 10metres from bank top) are included in the development brief. Any development should also assess and take account of hydrological and connectivity issues that could be impacted by work in the corridor of the main river and should avoid any new crossing structures on the Northfield Brook.</p>	Locate buildings in FZ1. Opportunity to engage with West Oxfordshire on their neighbouring strategic site STRAT11 and possible masterplan. Opportunity to weave in a green corridor to link up with Spindleberry Nature Reserve.	
SPS 4	<b>MINI Plant Oxford</b>	FZ 1. Northfield Brook approx. 790 south of the site. Bedrock Secondary A aquifer. Presence of an investigated site. Presence of an investigated site	<b>Ground water protection</b> -This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use. <i>[Please note EA provided ground water protection comments on a planning application for some aspects of this site - 23/02166/FUL]</i>		

SPS 5	Oxford Science Park	<p>FZ 1, 2 and 3 (3b).          Littlemore Brook runs through the north of the site.          Bedrock Secondary A aquifer, Superficial Secondary A and Unproductive aquifers.          Presence of an investigated site.          European Water Vole, Deciduous woodland</p>	<p><b>Flood risk</b> - SPS 5 is a multi-part site. The majority of the site is within FZ1. FZ2 and 3 along the northern boundary. Includes a 10 m buffer to watercourse.          No new more or less vulnerable developments to be located in flood zone 3b.          Level for level compensation should be provided for any loss of floodplain storage in design flood event, to ensure development does not increase flood risk elsewhere.</p> <p><b>Ground water protection</b>- This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use.</p> <p><b>Ecology and Biodiversity</b>- we would look for reassurance that additional protective and enhancement measures are in place for the Littlemore Brook and wetland restoration and that ecological buffers zones (minimum 10m from bank top) are included in the development brief. Any development should also assess and take account of hydrological and connectivity issues that could be impacted by work in the corridor of the main river and should avoid any new crossing structures on the Northfield Brook.</p>	<p>Opportunity to engage with West Oxfordshire on their neighbouring strategic site STRAT11 and possible masterplan.</p>	
SPS 7	Unipart	<p>FZ 1.          Northfield brook approx. 590m south of the site. Bedrock Secondary A aquifer.          Presence of an investigated site</p>	<p><b>Ground water protection</b>- This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use.</p> <p><b>Ecology and Biodiversity</b>- we would look for reassurance that additional protective and enhancement measures are in place for river and wetland restoration and that ecological buffers zones (min 10m from bank top) are included in the development brief for the ordinary watercourse. New crossing structures should be avoided, and alternative access sought where possible and opportunities to develop wetland features explored on the Eastern boundary.</p>		

SPS 8	Bertie Place recreation Ground	<p>FZ 1, 2 and 3 (3b).          Unnamed main river approx. 10m to the west of the site.          Bedrock Unproductive aquifer, Superficial Secondary A aquifer.          Presence of an investigated site.</p>	<p><b>Flood risk</b> - Current Park elevation is raised above the 1% AEP extents. However, the park is an island within FZ3b. There are concerns on access / egress routes.          we have concern on building footprint once climate change is included. There is a planning application 23/00988/FUL for this site. We are objecting to this based on boundary treatments. It may be possible to deliver 30 dwelling but there is no evidence if there is space for more than 30 dwellings. Our main concerns are loss of floodplain storage and access routes which are not covered by the policy. We suggest that you include the following wording:  <i>Development should only be located in an appropriate flood zone in accordance with national policy and guidance. Level for level compensation should be provided for any loss of floodplain storage in design flood event, to ensure development does not increase flood risk elsewhere. It shall be demonstrated that safe access and egress in the event of a flood can be provided.</i></p> <p><b>Ground water protection</b> - This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use.</p> <p><b>Ecology and Biodiversity</b> - we would look for reassurance that additional protective and enhancement measures are in place for river and wetland restoration and that ecological buffers zones (minimum 10m from bank top) with both design and maintenance regimes are included in the development brief for the main river on the western boundary of the site. Opportunities to develop wetland features should be explored on the Eastern boundary.</p>		<p><u>Points of clarity and accuracy</u>          We are pleased to note that the element called 'Land behind Wytham Street' has been removed from this allocation. Therefore, we have no issues with this allocation from an OFAS stance.</p>
SPS 9	Blackbird Leys Central Area	<p>FZ 1.          Northfield Brook approx. 130m south of the site, unnamed main river approx. 145m northwest of site.          Bedrock Secondary A aquifer.          Presence of an investigated site</p>	<p><b>Ground water protection</b> - This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use.</p>		

SPS 10	Knights Road	<p>FZ 1, 2 and 3 (3b). Northfield Brook runs through/ along the south of the site. Historic landfill site (Spindleberry Close), Bedrock Secondary A aquifer. Presence of an investigated site. Deciduous woodland, European Water Vole</p>	<p><b>Flood risk</b> - Majority of the site is within FZ1. Includes a 10m buffer to the watercourse. Awaiting exception test.</p> <p><b>Ground water protection</b> -This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use.</p> <p><b>Ecology and Biodiversity</b>- we would look for reassurance that additional protective and enhancement measures are in place for river and wetland restoration and that ecological buffers zones (minimum 10m from bank top) are included in the development brief for the Northfield Brook. Opportunities to develop wetland features should be explored on the Southern boundary.</p>	<p>Opportunity to provide access to adjacent nature park.</p>	
SPS 11	Cowely Marsh Depot	<p>FZ 1 and 2. Boundary Brook runs through/ along the south side of the site. Bedrock unproductive aquifer, Superficial Secondary A aquifer</p>	<p><b>Flood risk</b> - Majority of the site is within FZ1. The 1% AEP is within the 10m watercourse buffer. Ingress / egress currently to site is through FZ3. Awaiting exception test.</p> <p><b>Ecology and Biodiversity</b>- we would look for reassurance that additional protective and enhancement measures are in place for river and wetland restoration and that ecological buffers zones (minimum 10m from bank top) for the Boundary Brook are included in the development brief.</p>	<p>Historic flooding at Marsh Road trash screen and upstream. Opportunity to include flood storage to reduce flooding from the Boundary Brook as part of a catchment approach to reduce flood risk. Aim to reduce discharge to the Brook via SuDS.</p>	
SPS 12	Templars Square	<p>FZ 1. Boundary Brook approx. 660m north of site. Bedrock Secondary A aquifer. Presence of an investigated site</p>	<p><b>Ground water protection</b> - This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use.</p>		

SPS 13	Land at Meadow Lane	<p>FZ 1, 2 and 3 (3b).  River Thames approx. 190m west of the site.  Bedrock Unproductive aquifer.  Presence of an investigated site</p>	<p><b>Flood risk</b> -Main part of the site in FZ1. FZ 2 and 3 on western boundary. Over half of FZ2 is within the 10m buffer. Suggested wording to be added to policy: Dwellings shall not be located in 3b. Level for level compensation should be provided for any loss of floodplain storage in design flood event, to ensure development does not increase flood risk elsewhere.</p> <p><b>Ground water protection</b> - This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use.</p> <p><b>Ecology and Biodiversity</b>- we would look for reassurance that additional protective and enhancement measures are in place for the ordinary watercourse which forms the western boundary of the site. any proposals should include both design and maintenance regimes for an ecological buffer zone.</p>	<p>Opportunity to enhance green infrastructure</p>	
SPS 15	Redbridge Paddock	<p>FZ 1, 2 and 3 (3b). Within the OFAS boundary.  Weirs Mill Stream approx. 16m approx. west of site.  Historic landfill site (Rivermead),  Superficial Secondary a aquifer, Bedrock unproductive aquifer.  Presence of an investigated site</p>	<p><b>Flood risk</b> - Majority of site within FZ1. 10m watercourse buffer is included in policy. Site access / egress is surrounded by FZ3. Awaiting exception test.</p> <p><b>Ground water protection</b> - This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use.</p> <p><b>Ecology and Biodiversity</b>-This site borders the Weir Mill Stream. The opposite bank is the water dependent Iffley Meadows SSSI which would be affected by any change in hydrology or water quality. Residential development here is likely to result in ecological damage and protection from that damage is difficult to achieve due to the shape of the site. If this site was used for residential development, we would look for reassurance that additional protective and enhancement measures are in place for river and wetland restoration and that ecological buffers zones (minimum 10m from bank top) including both design and maintenance regimes are included in the development brief. We would also expect that the design brief would describe how surface water would be dealt with so as not to affect water quality or hydrology within the watercourse.</p>		<p><u>Points of clarity and accuracy</u>  The western boundary of this site is adjacent to the temporary working area of the OFAS which runs along the cycle path. The very southern tip of the site is included within the temporary working area for OFAS. For purposes of accuracy and clarity this needs to be noted within the supporting text for this allocation as the sites boundaries overlap and construction programmes for the 2 projects will need to take account of the overlap.</p>

SPS 18	474 Cowely Road	<p>FZ 2. Boundary Brook approx. 105m south of the site. Bedrock unproductive aquifer, Superficial Secondary undifferentiated aquifer. Presence of an investigated site</p>	<p><b>Flood risk</b> - The site is within FZ2. The ingress / egress routes are within FZ2. The min site level elevation is 0.16m above the FZ3 level. Consider the impacts of climate change and to demonstrate that the occupants are safe for the lifetime of the development without increasing flood risk.</p> <p><b>Ground water protection</b> - This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use.</p>		
SPE 1	Government Building and Harcourt House	<p>FZ 1. River Cherwell approx. 160m west of the site. Bedrock Unproductive aquifer</p>	<p><b>Ecology and Biodiversity</b>- we would look for reassurance that the ordinary watercourse just south of the site has been adequately considered and that the hydrology and water quality have been adequately assessed. Opportunities for the creation or enhancement of wetland features may exist.</p>		
SPE 2	Land Surrounding St Clements Church	<p>FZ 1, 2 and 3 (3b). River Cherwell running adjacent to west side of site. Site boundary runs around a cemetery. Bedrock Unproductive aquifer. Presence of an investigated site Deciduous woodland, European Eel migratory route.</p>	<p><b>Flood risk</b> - 5% AEP along main river - may be all or mostly in 10m buffer zone. Small CC beyond that, likely to be able to deliver development here. Awaiting exception test.</p> <p><b>Ground water protection</b> - This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use.</p> <p><b>Ecology and Biodiversity</b>- In regard Ecology, we would look for reassurance that additional protective and enhancement measures are in place for river and wetland restoration and that ecological buffers zones (minimum 10m from bank top) are included in the development brief. Any development should also assess and take account of hydrological and connectivity issues that could be impacted by work in the corridor of the main river on the western boundary. Any design brief should ensure that no new river crossing structures are required over the watercourse.</p>	<p>Enhancement of land adjacent to watercourse to help reduce flood risk</p>	

SPE 4	Oxford Brookes University Martston Road Campus	<p>FZ 1. Peasmoor Brook approx. 650m west of the site. Bedrock Unproductive aquifer</p>	<p><b>Ecology and Biodiversity-</b> we would look for reassurance that additional protective and enhancement measures are in place for river and wetland restoration around the main river and ordinary watercourse and that ecological buffers zones (minimum 10m from bank top) are included in the development brief. Any development should also assess and take account of hydrological and connectivity issues that could be impacted by work in the corridor of the main river.</p>		
SPE 6	Churchill Hospital	<p>FZ 1. Boundary Brook runs along the west side of the site. Deciduous woodland. Bedrock Secondary A aquifer, Secondary Unproductive aquifer. Presence of an investigated site</p>	<p><b>Ground water protection -</b> This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use.</p> <p><b>Ecology and Biodiversity-</b>we would look for reassurance that additional protective and enhancement measures are in place for river and wetland restoration around the main river and that ecological buffers zones (minimum 10m from bank top) are included in the development brief. The site presents ample opportunity to improve connectivity to the Lye Valley and Cowley Marsh local nature reserve via the river corridor with careful native species landscaping and by creating appropriate levels of light and shade along the corridor. Any development should also assess and take account of hydrological and connectivity issues that could be impacted by work in the corridor of the main river. The development brief should also have strong protection for the continuity of the river corridor of the Boundary Brook and ensure that any essential new crossings are clear span bridges with no new culverts being created.</p>		
SPE 7	Nuffield Orthopaedic Centre	<p>FZ 1. Boundary Brook approx. 360m southwest of site. Bedrock Secondary A aquifer. Presence of an investigated site</p>	<p><b>Ground water protection -</b> This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use.</p>		

SPE 14	Slade House	<p>FZ 1. Boundary Brook approx. 600m west of the site. Bedrock Unproductive aquifer. Presence of an investigated site.</p>	<p><b>Ground water protection</b> - This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use.</p>		
SPE 15	Thornhill Park	<p>FZ 1. Bayswater Brook approx. 780m north west of site. Bedrock Secondary A and Unproductive aquifer.</p>	<p><b>Ecology and Biodiversity</b>- we would look for reassurance that additional protective and enhancement measures are in place for river and wetland restoration and that ecological buffers zones (minimum 10m from bank top) for the Bayswater Brook are included in the development brief. Monk's Wood local wildlife site its due south of the site - it is water dependant and may be hydrologically linked to the proposed site.</p>		
SPE 19	Ruskin Field	<p>FZ 1. Bayswater Brook approx. 570m north of the site. Bedrock Secondary A aquifer, Superficial Secondary A and Unproductive aquifers</p>	<p><b>Ecology and Biodiversity</b>- We are aware that the pond on the northern boundary of this site and the ordinary watercourse leading north will be hydrologically linked to the Bayswater Brook. We would expect any proposals to detail how surface water will be dealt with to avoid pollution to the watercourse</p>		

SPE 20	John Radcliffe Hospital	<p>FZ 1. Bayswater Brook approx. 475m north of the site. Bedrock Secondary A and Unproductive aquifers. Presence of an investigated site</p>	<p><b>Ground water protection</b> - This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use.</p> <p><b>Ecology and Biodiversity</b>- we note that the western boundary of the site is bordered by an ordinary watercourse which is not mentioned in the local plan description. We would look for reassurance that additional protective and enhancement measures are in place for the watercourse and its corridor and that ecological buffers zones (min 10m from bank top) for the watercourse are included in the development brief. The development brief should also have strong protection for the continuity of the river corridor and ensure that any essential new crossings are clear span bridges with no new culverts being created.</p>		
SPCW 3	Manor Place	<p>FZ 1, 2 and 3 (3b). Holywell Mill Stream runs adjacent to east side of the site. Superficial Secondary A aquifer, Bedrock Unproductive aquifer. Cemetery on west side of site boundary. Deciduous woodland, European Eel migratory route</p>	<p><b>Flood risk</b> - There is mention of possible ground raising for part of the site. If this occurs, then compensatory storage will need to be demonstrated through FRA. A 10 m buffer is required next to the stream. Suggested policy text: <i>Development should only be located in an appropriate flood zone in accordance with national policy and guidance. Level for level compensation should be provided for any loss of floodplain storage in design flood event, to ensure development does not increase flood risk elsewhere.</i></p> <p><b>Ecology and Biodiversity</b>- we would look for reassurance that additional protective and enhancement measures are in place for river and wetland restoration and that ecological buffers zones (minimum 10m from bank top) for the Holywell Mill Stream are included in the development brief. This is especially critical as this section of the brook is likely to be hydrologically connected to the water dependant local wildlife site Magdalen Meadow. The development brief should also have strong protection for the continuity of the river corridor of the Boundary Brook and ensure that any essential new crossings are clear span bridges with no new culverts being created.</p>		

<p><b>SPCW 4</b></p>	<p><b>Canalside Land, Jericho</b></p>	<p>FZ 1, 2 and 3 (3b).          Castle Mill Stream runs adjacent to west of site.          Superficial Secondary A aquifer, Bedrock Unproductive aquifer.          Presence of an investigated site</p>	<p><b>Flood risk</b> - Majority of site within FZ2 and whole site within 1% AEP plus 84% CC. Higher CC allowance of 41% should be applied as vulnerable development is proposed in a site with FZ3b. CONCERNED about deliverability - note voids no longer appropriate so would need level for level compensation which required land outside the floodplain. Ingress / egress routes within FZ2 &amp; danger for some. Mixed use proposed. More vulnerable will likely be in FZ2. Possible ground raising for part of the site - can there be compensation? A 10 m buffer is required next to the stream. Planning applications must be accompanied by a site-specific flood risk assessment and development should incorporate any mitigation measures. The FRA should look at options for early warning. A sequential approach should be taken to locating development on the site, with more vulnerable uses away from higher risk areas where possible. A drainage strategy will be required to manage run-off and may need a raised floor level for some of the site, to be informed by the FRA. Development should only be located in an appropriate flood zone in accordance with national policy and guidance. Level for level compensation should be provided for any loss of floodplain storage in design flood event, to ensure development does not increase flood risk elsewhere.</p> <p><b>Ground water protection</b> - This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use.</p>	<p><b>Ecology and Biodiversity</b>- Care should be taken to protect and enhance the canal on the western boundary of the site and to avoid any additional crossing structures.</p>	
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<p><b>SPCW 5</b></p>	<p><b>Oxpens</b></p>	<p>FZ 1, 2 and 3 (3b).  River Thames runs alongside south side of site, Castle Mill Stream runs along east side of site.  Superficial Secondary A aquifer, Bedrock Unproductive aquifer.  Presence of an investigated site.  Atlantic Salmon and European Eel migratory routes, deciduous woodland.</p>	<p><b>Flood risk</b> - Most of the site is in FZ1 with FZ2&amp;3 located mainly in the centre to southern boundary (and eastern side in extreme CC event). FZ3b is approximately 1/5 of the site. Ingress / egress route through an area at flood risk as site surrounded by FZ's 2 and 3. Sensitive area due to local heritage. Includes 10m buffer zone along River Thames. It is not low hazard so <b>concerned</b> regarding development on site in relation to access. A sequential approach should be taken to locating development on the site. More vulnerable development will be expected to be located away from the areas at highest risk of flooding and shall not be located in Flood Zone 3b. A drainage strategy will be required to manage run-off and may need a raised floor level for some of the site, to be informed by the FRA. Some of the access route is at risk of flooding (with low hazard - <b>should this read danger to some?</b>) so an evacuation strategy should be included as part of the FRA. Level for level compensation should be provided for any loss of floodplain storage in design flood event, to ensure development does not increase flood risk elsewhere.</p> <p><b>Ground water protection</b> - This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use.</p> <p><b>Ecology and Biodiversity</b>- we would look for reassurance that additional protective and enhancement measures are in place for river and wetland restoration and that ecological buffers zones (minimum 10m from bank top) are included in the development brief. Any development should also assess and take account of hydrological and connectivity issues that could be impacted by work in the corridor of the main river.</p>	<p><b>Ecology and Biodiversity</b>- River and wetland restoration opportunities.</p>	
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<p><b>SPCW 6</b></p>	<p><b>Nuffield Sites</b></p>	<p>FZ 1, 2 and 3 (3b).  Wareham Stream and Castle Mill Stream run directly between the two larger sections of this site.  Cemetery just south of site border.  Superficial Secondary A aquifer, Bedrock Unproductive aquifer.  Atlantic Salmon and European Eel migratory routes</p>	<p><b>Flood risk</b> - The site is a multi-part site (1,2 &amp;3). Should the individual sites be assessed separately e.g., the west part to 100% in FZ2. The other two site clip FZ3a&amp;b. A 10 m buffer is required next to the stream / canal. This is not demonstrated to be sound. <b>Concerns</b> regarding land raising set out in the exception test, this could increase risk elsewhere.</p> <p><b>Ecology and Biodiversity</b>- we would look for reassurance that additional protective and enhancement measures are in place for the Castle Mill Stream and the Wareham Stream and their corridors. Opportunities exist for the creation of effective ecological buffer zones to provide new habitats, and this should be a critical part of any development brief. This site has significant restoration opportunities for removal of hard bank protection which should be included in any new development. Any development should also assess and take account of hydrological, water quality and connectivity issues that could be impacted by work in the corridor of the main river.</p>		
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<p><b>SPCW 7</b></p>	<p><b>Osney Mead</b></p>	<p>FZ 1, 2 and 3 (3b). West corner of site within OFAS boundary.          Bulstake Stream runs along south side of site, River Thames along northeast of site, Osney Stream runs along north of site. Onsey Yard Depot (EA registered land on site).          Superficial Secondary A aquifer, Bedrock Unproductive aquifer.          Presence of an investigated site.          Bullhead, Coastland and floodplain grazing marsh, Atlantic Salmon and European Eel migratory routes, European Water Vole.</p>	<p><b>Flood risk</b> - Need higher CC allowance (41%) so 78-95% of site in design flood event. Would not be able to increase footprint much if at all (note voids are no longer supported as compensation in accordance with PPG update).          Would the proposed development be achievable in existing footprint size?  <b>Concerned</b> on land raising that maybe proposed for the site.          No safe access/egress as surrounded by FZ3b.</p> <p><b>Ground water protection</b> - This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use.</p> <p><b>Ecology and Biodiversity</b>- we would look for reassurance that additional protective and enhancement measures are in place for river and its corridor, opportunities exist for the creation of an effective ecological buffer zones (minimum 10m from bank top) and this should be a critical part of any development brief. This site has significant restoration opportunities for the removal of hard protection which should be included in any new development. Any development should also assess and take account of hydrological, water quality and connectivity issues that could be impacted by work in the corridor of the main river.</p>	<p>Relocate buildings out of FZ3b and into areas of site at lower flood risk. Design buildings to be resilient to flooding and create floodplain storage in functional floodplain</p>	<p><u>Points of clarity and accuracy</u>          The allocation site is adjacent to OFAS which includes a flood embankment and flood wall in close proximity to the allocation site. For purposes of accuracy and clarity this should be acknowledged in the supporting text for the site and within the policy as OFAS is an important infrastructure development for Oxford</p>
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<p><b>SPCW 8</b></p>	<p><b>Botley Road Retail Park</b></p>	<p>FZ 1, 2 and 3 (3b).          Tiny portion of northwest corner of site within OFAS boundary.          Seacourt stream approx. 25m west of site.          Superficial Secondary A aquifer, Bedrock Unproductive aquifer.          Presence of an investigated site.</p>	<p><b>Flood risk</b> - Need higher CC allowance (41%) so 69-87% of site in design flood event. May not be able to increase footprint much (note voids are no longer supported as compensation in accordance with PPG update). Would the proposed development be achievable in existing footprint size?          We have <b>concerns</b> that access and egress is through FZ3b.</p> <p><b>Ground water protection</b> - This site has been the subject of prior site investigations. An updated desk study and site investigation may be warranted. Subject to the findings, further remediation or soils or controlled waters, may be required to bring this site into use.</p> <p><b>Ecology and Biodiversity</b>- we would look for reassurance that additional protective and enhancement measures are in place for river and its corridor, significant opportunities exist for de-culverting the ordinary watercourse and the creation of an effective ecological buffer zones (minimum 10m from bank top) and this should be a critical part of any development brief. Any development should also assess and take account of hydrological, water quality and connectivity issues that could be impacted by work in the corridor of the main river</p>	<p>Relocate buildings out of FZ3b and into areas of site at lower flood risk. Design buildings to be resilient to flooding and create floodplain storage in functional floodplain</p>	<p><u>Points of clarity and accuracy</u>          The allocation site is adjacent to OFAS. The policy mentions OFAS and says that the site allocation redevelopment 'should have consideration about the potential impact from the OFAS'. The wording of this policy should be amended as it is not the impact of OFAS that needs to be considered but the impact of the redevelopment of the site on OFAS. For purposes of accuracy and clarity the close proximity of OFAS should be acknowledged in the supporting text for the site and within the policy as OFAS is an important infrastructure development for Oxford.</p>
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