

Statement of Common Ground between Oxford City Council and the Environment Agency

Submission Draft (Regulation 19) Oxford Local Plan 2045

July 2026

1.0 Introduction

1.1 This Statement of Common Ground (SoCG) has been prepared between Oxford City Council and the Environment Agency for the Oxford Local Plan 2045. This SoCG reflects and confirms the current position on matters agreed by both parties with regard to the Duty to Cooperate.

1.2 Oxford City Council is producing a new Local Plan covering the period to 2045. The SoCG reflects the latest position agreed by the parties and is provided without prejudice to other matters that the parties may wish to raise. The area covered by this Statement is Oxford, which is the area covered by the Local Plan. Where matters arise that are cross-boundary, the Council is also working with its neighbouring local authorities and other SoCGs have been prepared on cross boundary matters.

2.0 Background and Maintaining Effective Cooperation

2.1 The Local Plan 2045 has been prepared within a changing strategic national context. The legal Duty to Cooperate test was revoked on 25 March 2026 and has been replaced by a policy test whereby plan-making authorities now should demonstrate “effective cooperation”.

2.2 The Environment Agency is a non-departmental public body responsible for a number of areas including water quality and resources, conservation and ecology, and managing the risk of flooding from main rivers, reservoirs, estuaries and the sea. The Environment Agency is not responsible for surface water and ground water flood risks, these being the responsibilities of the Lead Local Flood Authority (Oxfordshire County Council). They are a statutory consultee and a key stakeholder for the Council to work with in regard to maintaining effective cooperation on the new Oxford Local Plan 2045.

2.3 Oxford City Council and the Environment Agency have been engaging closely together throughout the process of developing the Local Plan 2045. The Environment Agency have provided feedback at each of the key stages of Local Plan consultation process, including the Issues Stage (2025), Preferred Options Regulation 18 consultation (2025), and the Proposed-Submission Draft Local Plan Regulation 19 consultation (2026). The relevant consultation summary reports detail summaries of this feedback. Officers have also engaged with each other at key points outside of the formal consultation cycle via virtual meetings in order to discuss the shaping of policies, the drafting of supporting evidence, and to collaborate and seek to resolve areas of disagreement wherever possible.

2.4 The Proposed-Submission Draft Local Plan Regulation 19 consultation (hereafter “*the Reg. 19 consultation*”) saw Oxford City Council publish its full Local Plan and supporting evidence base which it proposed to submit for examination to Central Government in June 2026. As per the relevant legislation/regulations, this version of the Local Plan was one that the City Council considered to be ‘sound’ for adoption, meeting the specific requirements for soundness as are outlined in the National Planning Policy Framework. In response to the Reg. 19 consultation, feedback from the Environment Agency indicated there were a few areas in relation to the draft policies and supporting evidence

underpinning them which they considered did not meet the tests of soundness for adoption without additional modification.

2.5 Following the end of the consultation on 13 March 2026, Oxford City Council and the Environment Agency have been engaging together on the issues which the Environment Agency have identified with the Local Plan and supporting evidence, including via a virtual meeting (taking place 2 April 2026) as well as via email/phone. The aim of this collaboration has been to identify means of resolving issues identified by the Environment Agency through their Reg.19 consultation response, either through modifications to the Local Plan itself or through updates to supporting evidence, in order to reach a point whereby the Environment Agency can support the Local Submission without objection.

3.0 Strategic matters

3.1 As set out earlier, a range of comments and suggestions were put forward by the Environment Agency in relation to the policies of the Local Plan through the Reg. 19 consultation. Reference should be made to their letter dated 13 March 2026 for full details, although a summary of all their submitted comments is included in the table set out in Appendix A.

3.2 The Environment Agency raised a limited number of soundness issues in their consultation response, these were mainly focussed on ten of the Local Plan's proposed site allocations which the Environment Agency identified as currently being unsound and the Strategic Flood Risk Assessment (SFRA). In particular, the Environment Agency raised concerns with the following site allocation policies:

- Policy SPS1: 474 Cowley Road
- Policy SPCW11: St Thomas School and Osney Warehouse
- Policy SPS13: Ozone Leisure Park and Minchery Farmhouse
- Policy SPS7: Kassam Stadium
- Policy SPCW7: Nuffield sites
- Policy SPS12: Oxford Science Park
- Policy SPCW3: Canalside Land, Jericho
- Policy SPS4: Cowley Marsh Depot
- Policy SPCW8: Osney Mead
- Policy SPCW2: Botley Road Sites around Cripsey Road including River Hotel and Westgate Hotel

3.3 For some of these sites, the Environment Agency set out that they believed these could largely be overcome through providing more detail around the exact amount of development that will occur on site, including its layout and access/ egress points as well as ensuring that local modelling is undertaken in site-specific FRAs where local modelling is absent/ outdated. Some broader concern was expressed around the principal of development to SPCW3 Canalside Land, Jericho and SPCW8 Osney Mead as well as significantly reducing the amount of development proposed at SPCW7 Nuffield sites, SPS4 Cowley Marsh Depot and at SPCW2 Botley Road Sites around Cripsey Road including River Hotel and Westgate Hotel.

3.4 Comments were also received against four other policies in the Local Plan. These were:

- Policy G2: Enhancement and Provision of New Green and Blue Features
- Policy G8: Sustainable Drainage Systems (SuDS)
- Policy R5: Water Resources and Quality
- Policy I2: Safeguarding Land for Infrastructure (a - Oxford Flood Alleviation Scheme)

Whilst these were not identified as soundness issues, the Environment Agency set out that these further comments and recommendations would help to clarify the proposed plan and support its implementation by providing clarity and accuracy in accordance with paragraphs 14 and 15 of the NPPF.

3.5 It should be noted that no comments were received for Policy G7 (Flood Risk and Flood Risk Assessments). The Environment Agency are satisfied that two previous comments made against the Regulation 18 version of this policy have been included/ updated in this version. This is a good example to show effective and successful cooperation between both parties.

3.6 In relation to the key soundness concerns highlighted under para 3.2 and 3.3, the parties agree that the proposed modifications set out in the appendix will address the majority of concerns raised. Some clarity has also been provided by the Council in respect of allocations SPCW7 Nuffield sites and SPCW2 Botley Road Sites around Cripsey Road including River Hotel and Westgate Hotel. This should demonstrate that the amount of development proposed relates to the total area of all parcels within the respective site allocation, not individual ones, resulting in a larger site area than what is referred to in the comments initially received from the Environment Agency. More clarity has also been provided to confirm that the minimum amount of development expected at SPS7 Kassam Stadium is linked to the two other relevant sites (SPS11 and SPS13) and that there is potential to split the development across all three sites as long as the minimum housing number is achieved across them.

3.7 At time of the submission of the Local Plan, there remains an area where common ground has not been reached – mainly the principal of development at SPCW3 (Canalside Land, Jericho), SPCW8 (Osney Mead) and SPS4 (Cowley Marsh Depot). The Council has set out in the Appendix as to why they believe these three site allocations should remain in the Local Plan. However, the Environment Agency do have remaining concerns about several elements of these allocation policies, particularly as there may not be enough space for the proposed built development without increasing flood risk off-site due to the land raising that is likely required on both SPCW3 (Canalside Land, Jericho) and SPCW8 (Osney Mead), and that the proposed access and egress routes would cross areas that have a flood hazard rating of ‘danger for some’ or ‘danger for most’ in the case of SPCW8 (Osney Mead). These remaining concerns have not been resolved at this time.

4.0 Concluding remarks/areas of agreement

4.1 Oxford City Council and the Environment Agency have worked closely together throughout the Local Plan preparation process and the subsequent discussions following the Reg.19 consultation. This Statement of Common Ground and the accompanying Appendix set out the changes that the two parties have agreed to in order to overcome the vast majority of issues and additional recommendations that the Environment Agency had initially identified.

4.2 The statement sets out in paras 3.6 to 3.7 where it has not been possible to find a resolution to an issue raised, with both parties' positions outlined. To summarise, this relates to concerns about three of the Local Plan's site allocations, SPCW3 (Canalside Land, Jericho), SPCW8 (Osney Mead), and SPS4 (Cowley Marsh Depot) including the principal of SPCW3 as a site allocation and the amount and type of development at SPCW8 and SPS4.

4.3 Whilst this additional work and engagement between the two parties has allowed us to find common ground on nearly all issues, both parties will continue to work together on the remaining identified issue as well as any others that arise during the examination process, as well as in preparing supporting guidance (such as Technical Advice Notes) in order to help implement the new Local Plan in due course.

Signed on behalf of Environment Agency

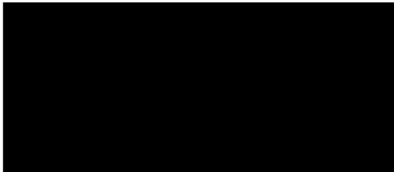


Judith E Montford

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Date: 14 July 2026

Signed on behalf of Oxford City Council



David Butler

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Date: 14 July 2026

Appendix A - Environment Agency Reg 19 Feedback (Local Plan policies) and Oxford City Council responses

The table in this appendix sets out the City Council's responses and proposed amendments to the Local Plan agreed with the Environment Agency to address their Reg 19 comments. It addresses comments on policies in chapter 4-5 first, then comments on sites (chapter 8) and lastly evidence base, particularly the SFRA.

Policy/ Para	Environment Agency summarised comments	Environment Agency suggested changes	Council response	Final position
Policy G2: Enhancement and Provision of New Green and Blue Features	1. The second bullet of the 'Policy Implementation' section refers to "embankments" which can cause confusion as it suggests a manmade raised bank top. Replace this word with "bank tops". 2. Box 4.1 misses the opportunity to strengthen the ecological connectivity provided by rivers – suggest additional wording. 3. Acknowledge that Policy G7 contains a statement on culverts but that is in the context of flood risk and it not being seen as a requirement for the benefit of ecology within the watercourse environment. This should be included as requirement of Policy G2. 4. As per point 2 above, the strengthening of the ecological	Amendments to wording, corresponding to the five points made: 1. Amend bullet two as follows: <i>".... seeks to facilitate opportunities to re-naturalise spaces near watercourses. This could mean thinking about ways to reinstate embankments bank tops by removing artificial materials and 're-wilding' them which can...."</i> 2. Amend paragraph entitled "Strengthening linkages between area to enhance network connectivity" as follows: <i>"by incorporating linear features like lines of trees/hedges, creating new</i>	1. Agree that the wording to Policy G2 can be amended as requested in the suggested change by the Environment Agency. 2. Agree that the additional wording to the supporting text can be amended as requested in the suggested change by the Environment Agency. 3. The Council considers that Policy G7 clearly states the importance of not allowing culverting of open watercourses and that the supporting text of this policy highlights the ecological benefits of not allowing culverts. This does not need to be repeated in Policy G2.	The Council's response is accepted, and the Environment Agency's initial objection is now resolved.

Policy/ Para	Environment Agency summarised comments	Environment Agency suggested changes	Council response	Final position
	connection provided by rivers should also be reflected in the wording of Policy G2. 5. Within the Policy, more emphasis should be placed on protecting blue corridors and more detail provided on where the ecological buffer zone should be measured from.	<i>pockets of green space that can form ‘stepping stones’ between larger spaces or taking opportunities to <u>ecologically enhance river corridors and</u> open up and enhance access to.....”</i> 3. Amend Policy G2 to include the following requirement: <u>“Planning permission will only be granted for proposals which do not involve the culverting of watercourses, and which do not prejudice future opportunities for de-culverting. Opportunities for de-culverting of watercourses should be actively pursued as a valuable enhancement to rivers and streams.”</u> 4. Amend bullet d of the Policy as follows: <i>“Where there is an opportunity to strengthen links between green spaces, particularly ecological sites, creating linkages with</i>	4. Agree that the additional wording to Policy G2 can be amended as requested in the suggested change by the Environment Agency. 5. Agree that the additional wording to the following header within the policy: <i>“Opportunities to enhance <u>and protect</u> blue corridors”</i> can be amended as suggested by the Environment Agency. However, the Council considers it more appropriate to include the reference to where the ecological buffer zones should be measured from within the ‘policy implementation’ section of the supporting text, rather than within the policy.	

Policy/ Para	Environment Agency summarised comments	Environment Agency suggested changes	Council response	Final position
		<i>surrounding green infrastructure (e.g. by including lines of trees/hedges <u>and river corridors</u> to support linkages)”.</i> 5. After bullet j, the next header should be amended to: <i>“Opportunities to <u>protect and</u> enhance blue corridors.”</i> Part of the text below this header should also be amended to: <i>“An ecological buffer zone of at least 10 metres <u>(measured from the top of the bank)</u> with should be retained, or if it is not already in place it should be reinstated where possible.</i>		
Policy G7: Flood Risk and Flood Risk Assessments	The Environment Agency are pleased to note that the two previous comments made against the Regulation 18 version of the Plan have been included/ updated in this version.	N/A	Support is noted – thank you. No further action proposed other than linked actions under the SFRA section below.	As indicated in the SFRA section below; the Council has identified some additional wording for the ‘Policy Implementation’ section of the supporting text of Policy G7. This is supported by the Environment Agency. See the

Policy/ Para	Environment Agency summarised comments	Environment Agency suggested changes	Council response	Final position
				SFRA section below for more information.
Policy G8: Sustainable Drainage Systems (SuDS)	Propose additional wording to policy to highlight that deep infiltration features are generally not supported.	Amend the end of the third paragraph of the policy as follows: <i>“Infiltration SuDS measures would not be encouraged in areas that have shallow groundwater as these measures would not be suitable. <u>Deep infiltration features/soakaways are generally not endorsed and not considered to be SuDS.</u>”</i>	Do not consider that an amendment to the policy is required. An additional bullet to include some of this information would be more appropriate within the ‘policy implementation’ section of the supporting text. We are happy to include the first part of the sentence but do not think it is necessary to include “ <i>and not considered to be SuDS</i> ” because whilst these features may not be desirable, they could still generally be described as SuDs.	The Council’s response is accepted, and the Environment Agency’s initial objection is now resolved.
Policy R5: Water Resources and Quality	Generally support the Policy but would like it to show that new developments will not use non-mains drainage where connection to the public sewer is considered reasonable.	Amend Policy R5 to include the following requirement: <i>“The use of private sewage disposal facilities within publicly sewered areas will only be acceptable if the applicant can demonstrate that the additional cost of connecting to the sewer would be unreasonable, connection is not practically feasible, or the proposed private sewerage system would provide additional environmental</i>	We are happy to propose a modification to add an additional requirement under the foul and surface water drainage section (in between the two existing paras) of the policy as follows: <u><i>Proposed development should avoid utilising private wastewater drainage systems where a public sewer connection is available, unless the necessity of this can be robustly justified.</i></u>	The Council’s response is accepted, and the Environment Agency’s initial objection is now resolved.

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		<i>benefits that would outweigh the potential environmental risks.”</i>	We suggest the justification requirement should be expanded upon in the policy implementation text above the policy. We propose an additional bullet point to be added under policy implementation as follows: • <u><i>Relying upon private wastewater drainage methods, such as septic tanks, introduces additional environmental risks as it will typically fall on the owner to ensure that they are appropriately maintained in future, in order to avoid wider contamination due to spills/leaks. Developments are therefore expected to connect into the public sewer system for drainage of wastewater unless an alternative approach can be robustly justified, such as by showing that public sewer connection is unfeasible, or that there would be additional environmental benefits that would outweigh the potential environmental risks.</i></u>	

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Policy I2: Safeguarding Land for Infrastructure (a - Oxford Flood Alleviation Scheme)	The Environment Agency are pleased that the Council has taken their advice about including a safeguarding policy in relation to the Oxford Flood Alleviation Scheme (OFAS) and that it is included in the Policies Map. The site boundaries of two of the allocations: Osney Mead and Redbridge Paddock lie adjacent to OFAS. It would therefore be beneficial if OFAS was referenced in these respective site allocation policies.	Amendments to Policy SPS14 (Redbridge Paddock) and Policy SPCW8 (Osney Mead) to include a reference to OFAS. To note- these sites are adjacent to the safeguarded area of the OFAS, but Redbridge Paddock is not directly adjacent to the proposed OFAS channel.	Agree that the reference to OFAS can be added as a new paragraph at the end of the "Open space, nature, flood risk" section of both site policies SPS14 (Redbridge Paddock) and SPCW8 (Osney Mead), as follows: <i><u>"Land safeguarded for OFAS is adjacent to the site (Policy I2)."</u></i>	The Council's response is accepted, and the Environment Agency's initial objection is now resolved.
SITES referred to but not in Reg 19 document	The Environment Agency has made various comments on the following 11 sites: • 1 Pullens Lane • 2 Harberton Mead • Bayards Hill Primary School Part Playing Fields • Clarendon Centre • Edge of Playing Fields, Oxford Academy • Land off Harolde Close • Old Road Campus • Oriel College Sports Ground and adjoining land (comprising 263 and 639) • ROQ site • Oxford Stadium • Uni of Oxford Science Area & Keble Road	N/A	The Council has confirmed to the Environment Agency that these sites are not allocated in the Reg 19 version of the Plan, and therefore if these sites were to come forward, they would be assessed against the generic policies of the Local Plan, like any other windfall site.	The Environment Agency has enquired whether any of these 11 sites are likely to be windfalls, because if they are, Oxford City may want to state how they will address the flood risk concerns and draw on the comments the Environment Agency has made about these sites. The Council regards that these sites will be assessed in the same way as any windfall application that would need to address flood risk, and that both national policy and the relevant local plan policies already account for this.

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Policy SPS1: 474 Cowley Road	29% (0.12ha) of the site is covered within fluvial flood extents. No proposed number of dwellings offered currently, so unable to confirm general allocation suitability regarding floodplain compensation concerns. Concerned with safe access/egress routes having to travel within FZ3a and flashy catchment.	Require minimum number of dwellings for site to ascertain if floodplain compensation can be achieved on site. A more detailed review of the access/egress to the site will still need to be undertaken within a SFRA - these routes should be provided and avoid FZ3a.	The Level 2 SFRA considers that the main access to the site does lie within the design flood event and that a site-specific FRA would need to further investigate this and likely utilise updated modelling results for Boundary Brook. We are happy to propose a modification to include an additional requirement (at the start of the final sentence of bullet d)	The Council's response is accepted. The Environment Agency has confirmed that they agree that there should be suitable space on site for this proposed allocation to not require floodplain compensation or if so, very minimal amounts. The Environment Agency require a more detailed review

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	Updated modelling will also be required to confirm site suitability.		under the open space, nature and flood risk section of the policy as follows: <i><u>Updated modelling of Boundary Brook will also be required to inform a site-specific FRA, which should also consider in more detail the nature of the surface water flood risk to determine how quickly it occurs and the degree of hazard on site.</u></i> In respect of the other points raised, a minimum number of dwellings expected on this site allocation (14) is provided in the policy. The Level 2 SFRA undertaken for this site highlights that development is possible as the majority of the site lies within Flood Zone 1 and outside the design flood extent (so floodplain compensation may not be necessary or minimal). In addition, the areas of high surface water flood risk mirror the fluvial flood extents. In this regard it should be possible to accommodate development at the site. The site allocation policy reflects the level of flood risk present at the site, particularly along the access	of the access/egress to the site to be undertaken within a SFRA where routes are proposed to avoid FZ3a. The Council has suggested that this is addressed through a modification to the site allocation policy, requiring updated modelling of Boundary Brook to inform any site-specific FRA. The Environment Agency agree with this approach and that a more detailed assessment of safe access and egress will be undertaken and consider that this site is developable and deliverable and therefore sound. The Environment Agency's initial objection is now resolved.

Policy/ Para	Environment Agency summarised comments	Environment Agency suggested changes	Council response	Final position
			and states that this should be considered in a site-specific FRA. We feel this is more appropriate as it is dependent on the design of the site which is unknown at this present time. Any development proposal would also have to meet the requirements of Policy G7 which addresses flood risk and FRAs and clearly sets out the criteria that need to be met before planning permission will be granted.	
Policy SPCW11: St Thomas School and Osney Warehouse	Site is 0.41ha with 10 dwellings proposed (0.17ha). With 92% of the site being inundated during the design flood event, there is limited space on site outside of design flood event for suitable development/compensatory storage.	It is very unlikely that without substantial re-development that suitable floodplain compensation will be possible on this site, and without this, the site would be undevelopable. The policy should explicitly state that the development would need to not increase the footprint compared to the existing built footprint on site.	A site-specific FRA is required for this site which is located within Flood Zone 2 and currently contains development. It is made up of two parcels – one containing a former school building and the other the warehouse. The Level 2 SFRA does highlight that the parcel containing the former school is at more risk of flooding than the Osney warehouse parcel, therefore it would be expected that the more vulnerable part of the allocation, i.e. the dwellings would be located here. The site allocation policy reflects this and specifically states that a sequential approach should be taken to locating development on	The Council's response is accepted. The site is considered to be developable and deliverable and therefore sound. The Environment Agency's initial objection is now resolved.

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			the site as well as highlighting that modelling will need to be undertaken to assess off-site impacts and compensatory requirements should ground raising need to be implemented. Furthermore, a significant part of each parcel already contains development, therefore it is unlikely that any new development will occupy a footprint larger than existing and therefore unlikely that compensation would be needed. The Council therefore considers that flood risk at this site has been addressed suitably in both the site allocation and flood risk policies and that no further action is required. We do not believe it necessary to include the point about not increasing the built footprint of the site in the allocation policy, as we consider that the requirements of Policy G7 already addresses this and explicitly states that proposed development should not increase flood risk elsewhere.	
Policy SPS13: Ozone Leisure Park and	Further information is needed regarding proposed number of dwellings before confirming soundness.	In order to address soundness points b and d, the number of dwellings must be confirmed	This site is one of three sites that are linked and the relevant site allocation policies clearly state this.	The Council's response is accepted. The site is considered to be developable and

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Minchery Farmhouse	Large amount of space on site outside of fluvial flood extents, so expectation is that the sequential approach would have to be taken.	and the LPA should set out that a sequential approach must be taken to site layout and ensure that development is outside the fluvial flood events.	Policy SPS7 (Kassam Stadium) contains the minimum number of dwellings to be delivered (290) but there is flexibility to deliver across all three sites if required as long as the minimum number is achieved. All three site policies clearly state that a site-specific FRA is required and that a sequential approach must be taken to locating development on the site. This site allocation specifically states that “development should avoid the areas of Flood Zone 3 along the brook and across the whole southwest corner,...”. The Council therefore considers that flood risk at this site has been addressed suitably in both the site allocation and flood risk policies and that no further action is required.	deliverable and therefore sound. The Environment Agency’s initial objection is now resolved.
Policy SPS7: Kassam Stadium	Updated modelling would be required to fully confirm suitability as we stated in our previous comments made on the level 2 SFRA.	Providing updated modelling and reflecting this in a Level 2 SFRA may overcome soundness points b and d.	As expressed for Policy SPS13 above, this site is one of three allocations that are linked. This allocation contains the minimum number of dwellings to be delivered (290) but there is flexibility to deliver across all three linked sites if required, as long as the minimum number is achieved. The allocation policy requires that a sequential approach must be taken to locating	The Council’s response is accepted. The site is considered to be developable and deliverable and therefore sound. The Environment Agency’s initial objection is now resolved.

Policy/ Para	Environment Agency summarised comments	Environment Agency suggested changes	Council response	Final position
			development on the site and specifically states that <i>“development should avoid the areas of Flood Zone 3 along the brook.”</i> The Council is aware that the Environment Agency’s Flood Map for Planning was updated in March 2025 and contains both national flood information and local flood model outputs but that these do not contain updated modelling for the smaller watercourses in Oxford, such as for Boundary Brook, Littlemore Brook and Northfield Brook. The Council discussed with the SFRA consultants whether to update the models for these brooks in the Level 2 SFRA, balancing this against the cost and usefulness of the information the modelling was likely to present. On balance, and taking a proportionate approach, the Council determined that it wouldn’t undertake further modelling for these brooks, due to the small number of allocations that would be affected but more importantly, it was considered that updated modelling of these brooks would not provide us with information that the Level 2 SFRA	

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			does not already consider. The Level 2 SFRA has indicated that this site is at low risk from fluvial (river) flooding but at moderate risk from all other sources including pluvial (surface water) flooding. Northfield Brook runs along the northern boundary of this site and based on the Environment Agency's updated RoFSW (Risk of Flooding from Surface Water) maps, it identified that that the surface water flood risk is concentrated around the southern section of the Kassam Stadium. Any site-specific SFRA undertaken will have to use the most up-to-date mapping available at the time, so this will also be flagged in any assessment and can be used to ensure that development, particularly more vulnerable development, is directed away from areas on the site that are at risk from any source of flooding. The Council therefore considers that the models for the watercourses such as Boundary Brook, Littlemore Brook and Northfield Brook do not need to be updated and that the risk has been identified in the Level 2 SFRA, especially from the surface water flood mapping, and that more	

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			detail will be available once a site-specific FRA is undertaken .	
Policy SPCW7: Nuffield sites Land South of Frideswide Square (624)	Site is 0.26ha with 59 dwellings (0.98ha) proposed for the site. Currently this would far exceed the site for available space. 100% of the site falls within the design flood event levels, so there would be no room available for floodplain compensation as currently proposed. There is no confirmation of this approach being undertaken so far.	Need to ensure the number of dwellings proposed can be built on the existing footprint of the site because flood storage compensation for any increase in built footprint is not feasible on this site. The site is currently contrary to paragraph 181 of the NPPF which states that within the site, the most vulnerable development is located in areas of lowest flood risk, additionally that development must not increase flood risk elsewhere.	This parcel is one of three parcels (including the Island Site off Hythe Bridge Street, and Worcester Street Car Park and Public House) that forms this site allocation. The minimum allocation of 59 dwellings is across ALL three parcels, not just this one. The policy requires a site-specific FRA to be undertaken and states that “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.” This applies to all three parcels and the Level 2 SFRA clearly shows that a large part of the Worcester Street Car Park lies in Flood Zone 1, even accounting for climate change and that the area of highest surface water flood risk mirrors a similar area. In addition, most of the Island Site is already covered in built development, therefore there is an opportunity to significantly improve flood	The Council’s response is accepted - it has been clarified that the three sites fall under one site allocation. The site is considered to be developable and deliverable and therefore sound. The Environment Agency’s initial objection is now resolved.

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			mitigation here as part of any redevelopment.	
Policy SPS12: Oxford Science Park	Would need confirmation regarding future use of land and modelling before we can confirm suitability. Available space on site for proposed allocation, but further information needed.	Must confirm the appropriate 'complementary uses' of the land and provide updated modelling to confirm the site's suitability for additional development to overcome the soundness issues. This is to ensure the development is located in appropriate areas and provides the necessary flood storage compensation if required, in line with paragraphs 170 and 174 of the NPPF which steers development away from high flood risk areas.	This is predominantly an employment site, where an element of residential would be supported and other complementary uses would be considered on their merits. The policy wording does state that <i>"parts of the site are Flood Zone 3b, mainly along the Brook, and a sequential approach should be taken to locating development on the site, with more vulnerable uses away from the highest flood risk."</i> Therefore, if an application were to come in for a more vulnerable use, such as housing, the FRA would have to demonstrate that it was sited in the lowest possible areas of flood risk within the site. This is possible as a large proportion of the site lies within Flood Zone 1 (accounting for climate change) and/ or not within an area of high surface water flood risk. It is not possible to provide more information on what will come forward as the policy provides some flexibility towards this, whilst	The Council's response is accepted. Confirmed that the site is predominantly for employment/ less vulnerable uses and if any housing/more vulnerable developments are considered they will be placed within areas of lowest risk (large amount of FZ1 on site). The site is considered to be sound, and the Environment Agency's initial objection is now resolved.

Policy/ Para	Environment Agency summarised comments	Environment Agency suggested changes	Council response	Final position
			being clear that housing would not be the predominant use on site.	
Policy SPCW3: Canalside Land, Jericho	Concerned that there is insufficient space to deliver the proposed allocation without increasing flood risk elsewhere. We appreciate that the Level 2 SFRA discusses the use of the sequential approach to avoid placing new developments within FZ3b and ideally into areas of lowest flood risk in the first instance. However, 0.3 out of 0.5ha of the site is proposed to be used for development (dwellings). During the 1%+41% CC AEP design flood event, 78.3% of the site is inundated (0.39ha). In turn, there would be an extremely limited amount of space available outside of the design flood event (0.11ha) to propose suitable level for level compensation that would mitigate the floodplain storage space lost by the new development. As it appears very unlikely to offer enough space on site to offer suitable compensation, we would object to this at the planning stage. It is unlikely that this allocation as proposed would be deliverable. The Level 2 SFRA mentions using a freeboard of 300mm above the 26% CC AEP event (57.6m AOD) to mitigate flood risk to the development,	To address the soundness issues with this policy, the area of the site proposed for redevelopment would need to be reduced significantly to make suitable compensation possible. Alternatively, the existing footprint used. In this case the space available for flood storage compensation for any increase in footprint is limited and we have soundness concerns for the site's deliverability in accordance with paragraph 181 of the NPPF. Additionally, the correct climate change allowance of 41% should be used to assess the finished floor levels and a minimum 300mm freeboard imposed in addition to the design flood level (using 41% climate change allowance).	The Council acknowledges that this is a historical site where flood risk issues have become more complex over time, but also note that permission for a mixed-use scheme including residential development only recently lapsed in early 2026. This is a brownfield site where a large proportion of the site lies within Flood Zone 2, with the highest levels of flood risk more limited towards the western boundary of the site, adjacent to the Oxford canal. The site allocation does not contain a minimum number of dwellings and there is an opportunity to significantly improve the management of flood risk both on and off- site if the site is redeveloped. Much of the existing site area comprises impermeable hardstanding and there is potential to provide suitable compensation on greenfield land immediately adjacent to the site.	The Environment Agency note that some mitigation proposals have been proposed such as use of greenfield area adjacent to the site (which appears to fall outside of the climate change extents) for flood compensation, and they acknowledge the assessment of hazard risks to the site and proposed route that have been undertaken. However, for development to be possible in principle, a lot of detail is still required at this site, as well as within any future site specific FRAs/planning applications, which will be required to confirm this is the case. The Environment Agency therefore maintain an ongoing objection to the inclusion of this site allocation in the Local Plan as they consider the site to be unsound.

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	however, we would have expected the 41% CC AEP design flood event level of 57.75m AOD to have been used instead (so a minimum proposed level of 58.05m AOD). There are concerns regarding access and egress to the site. The site and surrounding area are heavily inundated during the design flood events, and safe access to and from the site appears to be limited.		The Level 2 SFRA has identified the best route of egress which is predominantly flood free apart from a 50m section along Combe Road. The hazard rating along Combe Road is low as in this section, a maximum depth and velocity of 0.12m and 0.01 m/s is reached. In addition, the site falls within the River Thames catchment which is dominated by chalk. It has a relatively slow river response times to storm events, being groundwater, rather than surface water dominated. This increases the time taken for inundation and for adequate warnings and preparation in an extreme flood event. The Level 2 SFRA assessed both scenarios using 26% and 41% climate change allowances to provide more detail on fluvial flooding. A site-specific FRA will provide more detail about the preferred finished floor levels at the time a planning application is submitted using the latest information. In conclusion, the Council believes that this site should still be	

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			allocated and that there will be opportunities to overcome the issues that have been raised by the Environment Agency. The allocation can make a positive contribution to Oxford's housing need, which already cannot be fully met within the city.	
Policy SPS4: Cowley Marsh Depot	Concerned that the development proposed would be inappropriate at the current scale proposed. The site is 1.7ha, with an estimated 83 dwellings (1.4ha) proposed within it. 30% of the site (0.51ha) falls within FZ3b, and in turn it is very likely that some of this area would be required to be used for the dwellings at the current scales proposed. More vulnerable development within FZ3b would be considered inappropriate. There also appears to be very limited space on site outside of the design flood event which covers 58% (0.99ha) to undertake an appropriate amount of level for level compensation that would be required for any new developments within this area. In turn there would be a significant amount of floodplain capacity lost at this site and would be	The first soundness issue to be addressed is to clarify that there will be no development within FZ3b, as this would be contrary to the NPPF and Table 2 of the PPG. The second soundness issue to be addressed is the area on site suitable for level for level flood storage compensation. The lack of space for compensation could result in an increase in flood risk elsewhere, contrary to paragraph 181 of the NPPF. The third soundness issue to be addressed is for the correct modelling to be used. The final soundness issue to be addressed is to ensure safe access and egress from the site.	The Level 2 SFRA considers that the main access to the site does lie within the design flood event and that a site-specific FRA would need to further investigate this and likely utilise updated modelling results for Boundary Brook. We are happy to propose a modification to include an additional requirement (within the second sentence of bullet f) under the open space, nature and flood risk section of the policy as follows: <i>f) A sequential approach must be taken to locating development on the site. A site-specific Flood Risk Assessment (FRA) will be required <u>which should be informed by updated modelling of Boundary Brook. The FRA should also</u></i>	Whilst improvements have been made in that the increased density of the buildings and updated modelling to be used are both positives to overturning the Environment Agency's concerns here, there is likely to be limited space on site for the current proposed development amount to provide suitable compensation for the lost flood storage areas within the design flood event. Updated modelling may provide further information to address this issue, however, it is unlikely to address the concerns. The Environment Agency therefore maintain an ongoing objection to the inclusion of this site allocation in the Local Plan as

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	considered to increase flood risk to the surrounding areas. Due to the scale of proposed development and lack of space for suitable compensation, we would likely object to this at the planning stage. Updated modelling is required as the current assessment is based of New National Model (NNM) informed data, which is suitable for high level use but not for site-specific FRAs where the risk is so high. Concerns regarding access and egress to the site, as the surrounding area is heavily inundated.	Paragraph 181 (part e) of the NPPF states that safe access and egress routes must be included for development within Flood Zones 2 and 3. Overall, it is likely that the development proposed will need to be heavily reduced in scale.	<i>investigate the flood risk the presence of the nearby culvert presents and identify...."</i> In respect of the other points raised, we have reconsidered the site capacity and believe that the same capacity can still be achieved with a slightly higher density on the site (70 dph instead of the previously assumed 60dph) which is still appropriate for that particular location and not located within FZ3b. The open space required on the site can be located within the areas of highest flood risk and there are opportunities on green space immediately to the rear of the site to provide flood storage compensation.	they consider the site to be undeliverable and unsound.
Policy SPCW7: Nuffield sites 70 - Island Site, Park End Street/Hythe Bridge Street	Concerns that there will not be sufficient space available on this site for development and not increase flood risk elsewhere. This site is 0.65ha in size and currently 59 dwellings (0.98ha) are proposed to be built. The Level 2 SFRA discusses a primary focus on re-developing the existing footprint to avoid the need for additional buildings. However, it appears unlikely considering the 59 new dwellings plus	This development as proposed is likely to cause an increase in flood risk to the surrounding areas, contrary to paragraph 181 of the NPPF. We would need to see the scale reduced significantly and for compensation to be undertaken/possible before this site before we would consider it deliverable and compliant with national policy.	As per our earlier response in respect of Land South of Frideswide Square, we would like to reiterate that the Island Site is one of three parcels that forms this site allocation. The minimum allocation of 59 dwellings is across ALL three parcels, not just this one. The policy requires a site-specific FRA to be undertaken and states that <i>"a sequential approach should be</i>	The Council's response is accepted - it has been clarified that the three site parcels fall under one site allocation and that previous concern for a lack of suitable space at this site has been acknowledged and overturned. The site is considered to be sound, and the Environment Agency's initial objection is now resolved.

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	other mixed uses, would fall within the redevelopment area and we have no confirmation this would be the case. 85% (0.55ha) of the site falls within the design flood event extents, so it is very likely that level for level compensation will be required for any new developments within this area. Considering the scale of the works proposed, it appears difficult to accommodate all the development without the loss of floodplain storage area. In turn this development as proposed is likely to cause an increase in flood risk to the surrounding areas.		<i>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.”</i> This applies to all three parcels and the Level 2 SFRA clearly shows that a large part of the Worcester Street Car Park lies in Flood Zone 1, even accounting for climate change and that the area of highest surface water flood risk mirrors a similar area. In addition, most of this parcel, the Island Site is already covered in built development, therefore there is an opportunity to significantly improve flood mitigation here as part of any redevelopment.	
Policy SPCW8: Osney Mead	The site is 17.8ha and considering the high portion of the site that falls within FZ3b (6.94ha or 39%), we have concerns that any proposed development within this area would be considered inappropriate (both less and more vulnerable). We appreciate that a sequential approach will be undertaken and that no development other than open space	Confirmation on the total scale of the development at this stage is required to confirm that no development will be within FZ3b and that development can be appropriately compensated for. As currently proposed, unless there is a significant reduction in the scale of development at this site, we will object to the proposal at the planning stage	This allocation is a large and complex brownfield site involving several parties who have been working together to bring it forward for redevelopment. Detailed design work has been undertaken and reviewed but it is an ongoing process. It is therefore not feasible at this stage to provide more detail in respect of the scale of the total development proposed. At present,	The Environment Agency understand that this is a very complex ongoing site with several groups involved, so it is difficult to get much detail at this stage. The updated response has confirmed sequential approach to be undertaken with housing to be kept out of high-risk areas and likely produced at a higher

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	and/or water compatible development will be undertaken within FZ3b. Confirmation on the total scale of the development at this stage is required. Currently we have only been given the number of dwellings that are proposed within the site at 247 (4.12ha) while the development also includes mixed less vulnerable uses as well (scale n/a). 86% of the site lies within the design flood event (15.31ha). The proposed dwellings alone would exceed the remaining space available outside of this extent (4.12ha) and therefore there does not appear to be suitable space available on site to provide level for level compensation at the scale required to avoid a reduction in flood storage capacity. This would be considered to increase flood risk to the surrounding areas and therefore unacceptable at the planning stage (also does not consider the mixed use less vulnerable developments in that scale). Ground level raising may also be required to raise the development above the required design flood event finished floor level, which would again	in line with paragraph 181 of the NPPF.	this site is predominantly in employment use and suffers significantly from a lack of comprehensive flood risk mitigation across the whole site. Its redevelopment provides an opportunity to significantly improve the management of flood risk both on and off-site. The allocation policy states It is expected that <i>“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, with car parks and other ancillary uses in higher risk areas where possible.”</i> Any housing on site will therefore be sited in the areas of lowest flood risk on the site and given that it is likely to be student accommodation, this can be built at a higher density than perhaps the Environment Agency is anticipating. The Level 2 SFRA highlights that development is already present on the site and that during the 1.0% AEP + 26% climate change design	density then first anticipated. Also aims to improve the site via the re-development of it and to look for methods to decrease flood risk to the site and surrounding areas. However, the Environment Agency’s general concerns regarding the lack of available compensation still stand, given 86% of the site falls within the design flood event. Any additional space lost that isn’t solely redeveloped would need to be compensated for, and if land requires ground raising (which appears likely) it again would need further compensation. The Environment Agency therefore maintain an ongoing objection to the inclusion of this site allocation in the Local Plan as they consider the site is not suitable given the current information and scale presented, and therefore it is still unsound.

Policy/ Para	Environment Agency summarised comments	Environment Agency suggested changes	Council response	Final position
	increase the amount of compensation required. Therefore, unless there is a significant reduction in the scale of development at this site, as currently proposed, we will object to the proposal at the planning stage.		event, the existing development is estimated to displace 10,200 m ³ cubed of water. Therefore, depending on its design, it's feasible that the redevelopment of the site could displace less than this amount of water, together with other opportunities to improve flood risk on site. The SFRA acknowledges that significant ground raising may be required due to the amount of the site that would lie below the appropriate floor level but that would need to be assessed through as site-specific FRA once the quantum and design of the scheme is known.	
Policy SPCW2: Botley Road Sites around Cripsey Road including River Hotel and Westgate Hotel 613 - Sites adjacent to Osney Bridge	For the sites adjacent to Osney Bridge, concerned that there will not be enough space on site to deliver the proposed allocation without increasing flood risk elsewhere. The sites combined are 0.3ha in size and 20 dwellings are proposed across them at 0.33ha of space. Currently this would only leave 0.01ha available for flood waters/ compensation. The scale of development would therefore exceed the available space available on site outside of the design flood event and	As currently proposed, it appears unlikely that this site will have suitable space to carry out the required amount of level for level compensation in accordance with paragraph 181 of the NPPF. Require confirmation of most of the site being re-developed with appropriate FFLs, and in turn a reduction in the scale of development with the design flood event for this site to be	This site allocation comprises of the following three parcels: *3-15 Botley Road and The River Hotel – 0.34ha *Land to the South of Cripsey Place – 0.31ha *Westgate Hotel, Botley Road and 3 - 7 Mill Street – 0.19ha with a total area of 0.84ha. All three parcels are predominantly brownfield sites that contain a mix	The Council's response is accepted. It has been clarified that the total area of the site allocation is larger than the 0.34ha initially assumed by the Environment Agency as the site allocation is formed from three parcels and the small site area informed a large amount of their previous concerns. It is now considered (although not confirmed) that there should be suitable space for the proposed developments,

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	would not have suitable space to undertake appropriate level for level compensation to avoid increasing the flood risk to the surrounding areas. Re-developments and new developments would also need to accommodate an appropriate Finished Floor Level (FFL) above the design flood event. The Level 2 SFRA discusses that most of the proposed development would be undertaken using the re-development of existing development and any new developments would be located within the areas of lowest flood risk. However, no final confirmation on how this will be split. 48% (0.16ha) of the site falls within the design flood event (of which is using the 26% when the 41% should be used for more vulnerable developments).	acceptable at the planning stage.	of more vulnerable and less vulnerable uses. The site allocation policy states that <i>“a sequential approach should be taken to locating development on the site, with more vulnerable uses away from the highest flood risk.”</i> Therefore, it is expected that the more vulnerable use of the mixed-use development such as the dwellings will be located in the areas of lowest flood risk within the allocation area. It is also considered that there is adequate room on site for the development to not increase flood risk on and off-site, especially due to the amount of existing development. Apart from The River Hotel parcel (located to the north of Botley Road), the other sites predominantly lie within Flood Zone 2, (even accounting for climate change), so we believe the 26% climate change allowances were the correct ones to use for the Level 2 SFRA. A site-specific FRA can assess this and the floor levels in more detail once a planning application is	especially if re-developments works are proposed. The site is considered to be sound, and the Environment Agency’s initial objection is now resolved.

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			submitted and the layout of the scheme is known.	
SFRA	Level 1 and 2 Strategic Flood Risk Assessment (SFRA): In the most recent versions of the Level 1 and 2 SFRAs we note that no updates were made following our previous comments made on 5 December 2025. Therefore, many of our previous comments regarding the sites and general SFRA wording remains. We have therefore reattached these comments and have also provided further information for each SFRA below: Level 1 SFRA - we do still have some concerns with the Level 1 SFRA as currently proposed. We have provided additional comments for the sections we are concerned with and have also provided additional wording that could be used to inform and overcome our concerns. Flood Zone 3b – the definition provided has been updated to use the 3.3% AEP event from any detailed modelling, and then when this is not possible to undertake applicant modelling. We consider this	See previous column	Level 1 and 2 Strategic Flood Risk Assessment (SFRA) - Updates were made to both the Level 1 and Level 2 SFRA reports after the 5th December. In particular, appendices 2 and 3 were added to the Level 2 SFRA report which addresses some of the previous comments made in earlier discussions prior to and after the Regulation 18 consultation. Flood Zone 3b - Appendix 3 of the Level 2 SFRA contains the data review for the Flood Map for Planning and Modelling Data Review. This also provides further explanation on the 3.3% AEP event and how it has been applied. For two of the site allocations – SPS1 (474 Cowley Road) and SPS4 (Cowley Marsh Depot), we have proposed a modification seeking an amendment to ensure that any site-specific FRA submitted for those two sites is informed by updated modelling of Boundary Brook. (These two proposed modifications	The Environment Agency is content with the modifications that have been proposed. Oxford City Council understand that the Environment Agency would ideally like to see the SFRA updated to include information supporting the Council's policy approach such as not supporting reliance on voids and including details of the general guidance/requirements for safe access/egress in the SFRAs so that applicants would have a basis to work from. The Council agrees that the SFRA is a live document which contains flood risk evidence for the city and should be up to date. However, the Council does not consider that the current version of the SFRA must be updated at this point, when the Environment Agency has agreed with the Council's policy approach to addressing flood risk and when these points are already clearly

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	acceptable. However, we previously requested that additional wording in the form of a definition is added to include a definition to cover the scenario where local detailed modelling is not available and needs to be undertaken. A precautionary approach would then need to be applied by using the FZ3 from the Flood Map for Planning (FmFP) as a proxy for FZ3b where local modelling is not available/feasible. Cumulative impacts – there is no section currently proposed to cover cumulative impacts apart from a brief coverage, within section 4.1. We were looking for a section to cover the potential cumulative impact of developments within Oxford City, particularly as many of the proposed sites include works within the floodplain. This can include potential mitigation methods and approaches to offering floodplain compensation. We would emphasise the need for level for level compensation, as the main method of flood storage compensation. Cumulative impacts of voids could lead to significant losses in floodplain storage across Oxford City		have been set out earlier in this Appendix.) For all other site allocations (and relevant planning applications submitted), we are happy to propose a modification by adding a final bullet to the ‘Policy Implementation’ section of the supporting text of Policy G7 (Flood Risk and Flood Risk Assessments (FRAs)) as follows: • <u>Site-specific Flood Risk Assessments should apply Flood Zone 3 from the Flood map for Planning as a proxy for Flood Zone 3b to ensure a precautionary approach is taken where local detailed modelling is not available or feasible.</u> Cumulative impacts – We think there is enough detail in both the relevant site allocation policies as well as Policy G7 as it is clear that flood risk cannot be increased either on or off site. However, for clarity, we are happy to propose a modification to	addressed through national policy and guidance. The Council will ensure that these points are included the next time the SFRA is reviewed. The Environment Agency maintain their position that the updates should be included now. The Environment Agency appreciate the points made by the Council but highlight that because the level 1 SFRA (which is the Council’s flood risk evidence based document that is used to plan for flood risk in Oxford City) is a live document that will be used to support FRAs and planning applications in the future, it is strongly recommended that the Council at the earliest opportunity update this evidence base document to reflect the additional comments made.

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	should these voids become blocked/silted and from impedance of flows from the supporting structures. Site Specific FRA – Guidance – There is lack of information to support applicants when completing their FRAs. The following bullet points cover more specific sections of concern. Freeboards/Finished Floor Levels (FFLs) – there is no section proposed to cover the requirements for FFLs/Freeboards within proposed developments. We are looking for minimum recommendations of suitable finished floor levels against the appropriate design flood event levels, i.e. expectation of 600mm above design flood event, with 300mm as the minimum recommendation. This is important to ensure future developments are safe for their lifetime. Floodplain compensation/storage – voids – there are no sections covering floodplain compensation/storage requirements and the appropriate methods of providing floodplain compensation. We would recommend providing some wording regarding		explicitly refer to level for level compensation at the end of the last sub-bullet of bullet three of the ‘policy implementation’ section of the supporting text as follows: • <i>Thirdly, once avoidance has been fully explored, mitigation measures will be required, these could include:</i> ○ <i>flood resistance measures (dry-proofing) e.g. barriers or raised floor levels to keep water out at times of flood;</i> ○ <i>flood resilience measures (wet-proofing) - using materials that can quickly dry out, helping buildings to be habitable again quickly;</i> ○ <i>Sustainable Drainage Systems (SuDS) to reduce surface water run off by slowing and storing water (see Policy G8); and</i> ○ <i>flood compensation measures e.g. creating new flood storage to mitigate any loss of storage through development (<u>i.e. level for level should be the main method of flood storage compensation</u>).</i>	

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	avoiding building new developments within the floodplain, but where this is not possible, that floodplain compensation is undertaken to ensure available flood storage capacity is not lost. The compensation method should be level for level. Voids should be avoided, with additional wording to confirm this. Floodplain compensation/storage is another section that should be included as it will have a direct impact on the safety of not just the development but the surrounding area in terms of flood risk. We understand that this is site dependent, and in turn acknowledge the wording being shaped around the scale of the development. However, it is important to have a section which discusses this and should be included as it will be directly checked in consultation reviews. Safe access/egress and emergency planning – there is no direct section covering the issue of safe access and egress to and from proposed development sites and the information that should be used to support it. We would recommend in turn including a section that covers not just emergency planning (4.4) and flood warnings (2.4)		We consider that it is preferential for the modification to be made in the Local Plan rather than the SFRA. In terms of voids, national policy already does not support this approach, and we have not referred to it in the Policy G7 or the supporting text – no further action required. Site Specific FRA – Guidance – whilst we agree that there is a lack of guidance in the SFRA, this does repeat national guidance, therefore it will already be considered when applicants submit an FRA – no further action required. Freeboards/Finished Floor Levels (FFLs) – point noted but we feel this is already sufficiently covered in Policy G7 which was informed by national guidance – no further action required. Floodplain compensation/storage – voids – point noted but national policy and guidance doesn't support the creation of voids for flood storage, therefore we feel that this point is already covered, even if it is	

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	but an additional section that includes the use of hazard ratings for sites where detailed modelling is available (or proxy alternates) to best inform the most suitable access/egress routes to and from the site. This again is another SFRA section that is covered during review and would be expected to at least be considered.		not explicitly stated in the Level 1 SFRA – no further action required. Safe access/egress and emergency planning – we consider that the individual Level 2 SFRAs have assessed the best route for each allocation, including the potential hazard of the route but that this would be explored in more detail in a site-specific FRA, particularly where updated modelling is required – no further action required. The Council agrees that some of these points raised in respect of the Level 1 SFRA could have been included as best practice. However, they do all already need to be considered as they form either part of the relevant national policy or guidance and to amend the SFRA would not fundamentally change any of the site allocations. If necessary, some of these details could be included in a Technical Advice Note (TAN) to assist applicants.	

