Environment Agency

For homes and habitats

9 November 2026

Oxford City local Plan Examination – Stage 2

Matters, Issues and Questions

Respondent: Environment Agency

Matter 5 – Site Allocations

SPCW3 – Canalside Land, Jericho

Q3 Is the allocation justified, having particular regard to local and national planning policies concerning flood risk?

Response No, the site allocation is not justified in regard to flood risk policy. The evidence currently available does not demonstrate that the proposed development can be accommodated to meet flood risk policy requirements.

The total site allocation area is 0.49ha. As highlighted in the Level 2 SFRA, assuming a medium housing density of 60 dwellings per hectare, an area of 0.3ha would be required for housing alone. This would leave 0.19ha to accommodate other policy requirements for a community centre, replacement operating boatyard, public open space and any flood risk compensation measures.

While the policy requires the application of a sequential approach to the site layout, it must be recognised that 78.3% of the site is at risk of flooding in the future due to climate change. Any development within this extent would reduce available flood storage that would need to be replaced elsewhere in order to ensure flood risk does not increase. There is insufficient evidence to demonstrate that a deliverable flood storage compensation strategy is achievable within the allocation boundary.

Furthermore, insufficient evidence has been provided to demonstrate that off-site flood compensation could be secured on land adjacent to the site, as suggested by Oxford City Council in the Statement of Common Ground. That land falls outside of the allocation boundary and no evidence has been provided to demonstrate its availability or suitability for delivering a flood compensation scheme.

National Planning Policy requires development plans to minimise flood risk to people and property, considering current and future flood risk. It also requires Planning Authorities to take account of advice from the Environment Agency on levels of risk and options for mitigation. Plans should ensure new development reduces the causes and impacts of flooding.

Proposed policy G7 in the submission plan requires Flood Risk Assessments to demonstrate that development will not increase flood risk off-site.

The Local Plan does not demonstrate that these policy requirements can be met. There is insufficient evidence to show there is an appropriate strategy to deliver a flood compensation scheme for this

site that will ensure the allocation policy requirements can be delivered without increasing flood risk elsewhere.

We therefore consider the allocation is not justified.

SPCW8 – Osney Mead

Q2 Is the allocation justified, having particular regard to local and national planning policies concerning flood risk?

Response No, the site allocation is not justified in regard to flood risk policy. The evidence currently available does not demonstrate that the proposed development can be accommodated to meet flood risk policy requirements.

We acknowledge Oxford City's aim of regenerating this site and its commitment to ensuring development follows a sequential approach to avoid placing vulnerable development in Flood Zone 3b. We also recognise Oxford City's aspiration in seeking methods to reduce flood risk to the site and surrounding areas as highlighted within the Statement of Common Ground.

Osney Mead sits in the West End and Botley Road Area of Focus within the submission plan and it is recognised within the supporting text that this site is at significant risk of flooding which presents significant implications for the type of development that would be allowed.

The Level 2 SFRA confirms that approximately 39% of the site is within Flood Zone 3b, including the site access, and that 86% of the site is at risk of flooding when considering future risk due to climate change. The SFRA confirms this poses a significant barrier to development and

recommends that proposed development should not exceed existing limits to ensure there is no further displacement of flood storage. Policy SPCW8 requires the delivery of a minimum of 247 dwellings (or equivalent number of student rooms) together with employment and academic uses. It requires development to be delivered in accordance with a masterplan-led approach.

However, there is insufficient evidence to demonstrate that a comprehensive and deliverable flood risk management strategy exists that would enable this scale of development to be accommodated without increasing flood risk elsewhere.

National Planning Policy requires development plans to minimise flood risk to people and property, considering current and future flood risk. It also requires Planning Authorities to take account of advice from the Environment Agency on levels of risk and options for mitigation. Plans should ensure new development reduces the causes and impacts of flooding.

Proposed policy G7 in the submission plan requires Flood Risk Assessments to demonstrate that development will not increase flood risk off-site.

The Local Plan does not demonstrate that these policy requirements can be met. There is insufficient evidence to show that the extent of development within the Policy can be accommodated alongside the flood storage compensation measures that will likely be required. A comprehensive flood risk management strategy does not currently exist.

We therefore consider the allocation is not justified.

SPS4 – Cowley Marsh Depot

Q2 Is the allocation justified, having particular regard to local and national planning policies concerning flood risk?

Response No, the site allocation is not justified in regard to flood risk policy. The site is at significant risk of flooding. In our agreed statement of common ground with Oxford City Council, we identified that approximately 30% of the site falls within Flood Zone 3b and we also said 58% of the site was within the design flood extent (1% annual exceedance probability with an allowance for climate change).
We wish to clarify that the figure of 58% referred to within the common ground statement does not in fact represent the design flood extent. Rather, the SFRA identifies this figure as the future extent of Flood Zone 3b when climate change is considered.

The Level 2 SFRA identifies that 60% of the site (approximately 1 hectare) is within Flood Zone 3a and 74% of the site (approximately 1.3 hectares) is within the design flood extent. While these figures differ to those quoted within our previous submissions, the site remains at significant risk of flooding and our position regarding this allocation is unchanged.

Given the proportion of the site at risk of flooding and the minimum number of houses proposed within the policy, it is likely that some residential units would need to be accommodated within Flood Zone 3a and/or the design flood extent. Residential units within Flood Zone 3a would only be acceptable if the exception test is met as required by national planning policy. Any loss of flood storage as a result of building within the climate change flood extent would need to be replaced elsewhere.

There appears to be insufficient land available within the allocation to deliver this mitigation. Therefore, development at the proposed scale could result in a loss of flood storage capacity and increase flood risk elsewhere. This is contrary to national planning policy objectives.

There are also uncertainties regarding the adequacy of the flood risk evidence base within the Level 2 SFRA for supporting this allocation. The SFRA acknowledges that flood levels and extents are estimated and therefore there is only moderate confidence in the SFRA conclusions. This is because there is no detailed hydraulic modelling for this site and the assessment using national scale modelling published by the Environment Agency. This means detailed modelling would be necessary to determine the developable area available. This is not referenced in the policy requirements and is likely to lead to an objection at the planning application stage if this detailed modelling is not provided.

National Planning Policy requires development plans to minimise flood risk to people and property, considering current and future flood risk. It also requires Planning Authorities to take account of advice from the Environment Agency on levels of risk and options for mitigation. Plans should ensure new development reduces the causes and impacts of flooding.

Proposed policy G7 in the submission plan requires Flood Risk Assessments to demonstrate that development will not increase flood risk off-site.

The Local Plan does not demonstrate that these policy requirements can be met. There is insufficient evidence to show that the extent of development within the allocation policy can be accommodated

alongside the flood storage compensation measures that will likely be required.

We therefore consider the allocation is not justified.