9 November 2026

Oxford City local Plan Examination – Stage 2

Matters, Issues and Questions

Respondent: Environment Agency

Matter 10 – Climate Change

Issue 4 – Flood Risk and Sustainable Drainage – Policies G7 and G8

Q1 Where site allocations are concerned, will development proposals be able to meet the requirements of Policy G7, having particular regard to criterion q) and the restriction of built footprints?

Response Policy G7 says planning permission will not be granted for development in Flood Zone 3b (including minor household development) except where it is for water- compatible uses or essential infrastructure; or where it is on previously developed land and includes a high standard of mitigation designed to demonstrably decrease flood risk on and off-site compared with the current situation. Criterion q stipulates that development will not lead to a net increase in the built footprint of the existing building within Flood Zone 3b and where possible will lead to a decrease.

The Environment Agency has raised soundness concerns with three site allocations in respect of flood risk. They are:

Policy SPCW3 – Canalside Land Jerico
Policy SPCW8 – Osney Mead
Policy SPS4 – Cowley Marsh Depot

Consequently, we do not consider sufficient evidence is available to demonstrate these allocations can satisfy all requirements of Policy G7 and we maintain our soundness concerns with these allocations.

Policy SPCW3 – Canalside Land, Jericho

Given the small proportion of Flood Zone 3b on site and the allocation policy requirements to follow a sequential approach to the layout, it should be possible to meet criterion q of policy G7.

However, as set out in our response to Matter 5 – site allocations, there is insufficient evidence to demonstrate that a deliverable flood storage compensation strategy is achievable within the allocation boundary or off-site as suggested by Oxford City Council in the Statement of Common Ground. This does not satisfy policy G7 (g) to ensure development does not increase flood risk off site.

Policy SPCW8 – Osney Mead

While the policy does indicate a sequential approach should be taken to the location of development in respect of flood risk, it goes on to say that More Vulnerable development will be expected to be located beyond areas of highest risk where possible. The policy does not explicitly require that development footprint within Flood Zone 3b is not increased and reduced where possible as required by Policy G7 (q).

Furthermore, as set out in our response to Matter 5 – site allocations, there is insufficient evidence to demonstrate that a deliverable flood storage compensation strategy is achievable that would satisfy policy G7 (g) to ensure development does not increase flood risk off site.

Policy SPS4 – Cowley Marsh Depot

Given the proportion of Flood Zone 3b on site and the allocation policy requirements on the number of dwellings and the requirements to follow a sequential approach to the layout, it should be possible to meet criterion q of policy G7.

However, as set out in our response to Matter 5 – site allocations, there is insufficient evidence to demonstrate that a deliverable flood storage compensation strategy is achievable that would satisfy policy G7 (g) to ensure development does not increase flood risk off site.