

SC address to council

(795 words)

Councillors, Ladies and Gentlemen,

I rise this evening to draw your attention to the concerns of the Oxford Flood Alliance about the proposed extension to Seacourt Park & Ride. In our view this development breaches national planning policy, and will increase flood risk during major events.

I realise that the normal protocol is for a member of the public to read out their address. I'm afraid I'm going to depart a little from normal practice. Over the past week we have obtained further information about this planning application which I wish to share as part of this address. I will be brief.

National guidelines on planning policy, the NPPF, steer planners away from siting developments in the functional floodplain, wherever practically possible. Oxford's own strategic planning document, the Core Strategy, follows these guidelines. Because Oxford is so vulnerable to flooding, the City Council has put in place additional, sensible, long-term policies to protect its floodplain, and in particular undeveloped, greenfield floodplain that absorbs and retains water during floods. Core Strategy 2 states: *Greenfield land will not be allocated for development if any part of the development would be on Flood Zone 3b*. Core Strategy 11 says: *Planning permission will not be granted for any development in the functional flood plain (Flood Zone 3b) except water-compatible uses and essential infrastructure*.

The proposed site for the new car park is greenfield, and in functional Flood Zone 3b. It is neither 'water-compatible', a category intended for developments such as marinas, nor 'essential infrastructure', which includes projects such as water treatment works, or roads which have to pass through a floodplain. This proposal is, in fact, precisely the kind of development that the policy is there to prevent.

The proposed site is wholly inappropriate for this development. It floods far more frequently than the existing car park, because it is more low-lying, and the water table is so near the surface that the ground water survey, provided with the planning application, admits that during the construction of the car park, the area will need to be partially drained – and that was from an assessment of the water table in April 2016. The area is so saturated that even in the summer it is still partially waterlogged.

The Flood Risk Assessment submitted by the consultants has many weaknesses. It does not even include reference to the most recent flood events. It only considers flooding between 1947 and 2008. But we all know that Oxford has experienced major flooding since then, in 2012, 2013 and 2014. Local residents say this site floods at least every other year. Flooding is becoming a more serious, rather than less serious problem in Oxford, and the Flood Risk Assessment fails to recognize that fact.

If the site wasn't in the floodplain, the proposed design would help reduce runoff. But because the site floods frequently, the porous surfaces proposed will soon clog with silt and become useless. There is no discussion anywhere in the planning documents of the costs of maintain a site which suffers serious flooding every other year. None at all.

In a major, large-scale flood, there is a serious risk of the fencing, the waiting area building, and other site furniture being washed into the Seacourt stream, together with any cars that may be stranded the car park. This would block a major flood route, impeding the drainage of the whole floodplain North of Botley Road and, worsening the impact of flooding across the whole of West Oxford.

The site is adjacent to the proposed Oxford Flood Alleviation Scheme. This planning application makes no attempt to respect the requirements of that scheme, and includes no consideration of the impact of increased flows across the area which the scheme will generate.

There is an alternative – temporary decking, similar to that at Oxpens currently, on the existing site. The planning documents say this is not possible because of a 'legal covenant on the land' where the P&R is currently situated. We asked to see the 'legal covenant', which had not been included in the planning documents. It turns out that what is being referred to is the Council's lease with the Co-op which includes a clause saying no structures can be put up on the site without the landlord's prior permission. That is the 'legal covenant on the land' supposedly leaving no option but to build in the functional floodplain.

Councillors, I put to you that this planning application is a major mistake. It breaches national flood planning policy and the City's own core strategy. The functional flood plain is a completely inappropriate location for a car park. Proceeding with this development would increase risk in large scale flooding events, and alternatives are available. We urge you not to proceed with this proposal.

Thank you.