

**APPENDIX 10.4**  
**ENVIRONMENT AGENCY SCOPING RESPONSE**

Ms. Caroline Ford  
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**Our ref:** WA/2020/128574/01-L01  
**Your ref:** 20/03254/SCOP  
**Date:** 05 January 2021

Dear Ms. Ford

**Scoping Opinion - Environmental Impact Assessment in accordance with Regulation 15 (2) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017**

**Bicester Eco Town exemplar site, Banbury Road, Bicester**

Thank you for consulting us on the above opinion, on 26 November 2020.

We have reviewed the following documents:

- Environmental Impact Assessment Scoping Report: Land North West of Bicester (issue 03), compiled by Barton Willmore LLP (dated 11/2020)

**Water Resources**

The applicant has stated that they intend to scope in water resources and flood risk. This chapter will include surface and foul waste drainage, as well as potable water provision. We welcome the inclusion of these topics within the report.

A development of this size is likely to require a phasing plan for building and habitation in order to make sure that the sewage undertaker can provide any necessary upgrades to their network to accommodate a higher influx of foul waste. We would like to see this discussed within the report, as well as evidence to suggest that the sewage and potable water undertaker has been consulted throughout the planning process.

It is recommended for this site that the applicant seeks to be as ambitious as possible with their water efficiency, using the water usage target for water stressed areas (110l/p/d) as a guide.

Local Plan Policy Bicester 1 – North West Bicester Eco-Town requires the development to be zero carbon and water neutral. Details on how this will be achieved will be included within an energy and water cycle study (EWCS). The EWCS should cover water efficiency and demand management, water quality improvements, WFD

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compliance, surface water management to avoid flood risk, and water services upgrades.

### **Flood Risk**

We are pleased to observe the commitment within the Environmental Impact Assessment (EIA) Scoping Report (Chapter 10) that a NPPF compliant Flood Risk Assessment (FRA) will be appended to the Environmental Statement (ES), with the ES also due to contain a chapter summarising this assessment. It is stated that this FRA will consider existing flood alleviation measures, “potential impacts of flooding to the site and identification of any necessary mitigation” and “residual risk after the implementation of any necessary mitigation measures, allowing for the future impacts of climate change”. As it is not explicitly stated, we wish to remind the compiler that the FRA should also consider the potential impacts of the development on flooding off-site and propose mitigation for these as necessary.

It's noted that the site resides within FZ3 close to the south-eastern boundary. Our GIS data does not reveal the presence of any detailed hydraulic modelling in this area. Therefore, in accordance with the document 'Thames Area Climate Change Allowances (v1.1, 02/2019)' and assuming the proposed development will be classified as “large major” and “more vulnerable”, future impacts of climate change on fluvial flooding will need to be informed by detailed hydraulic modelling. The EIA Scoping Report does not recognise this requirement.

In the absence of detailed modelling, we note that the Cherwell District Council SFRA states that “the extent of flood zone 3b is equal to flood zone 3a” (Table 4-3). We recommend that a ‘sequential location’ approach is taken in regards to minimising/avoiding development within flood zone 3 with an appropriate allowance made for climate change. Guidance on choosing appropriate climate change allowances for assessment and design can be found here:

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Local Plan Policy Bicester 1 – North West Bicester Eco-Town requires that there is no development in areas at risk of flooding. We recommend this is shown clearly on all documents and master planning drawings.

### **Biodiversity**

Section 7.3 summary omits a dry pond which is mentioned in the Flood Risk section 10.4

Construction phase - should also consider the impact of soil compaction on habitats to be retained and created, and close to watercourses. The catchment is predominantly clay which is particularly susceptible to compaction.

Operation phase – should also consider the impact on disturbance on on-site retained and created habitats, as the on-going biodiversity value of these habitats will be impacted by the level of disturbance from residents and pets.

Section 7.5, soil compaction and potential spread of invasive non-native species should be included in the table.

### **Green Infrastructure**

There is very little mention of green infrastructure in the scoping report. Local Plan Policy Bicester 1 – North West Bicester Eco-Town requires that 40% of the site will be dedicated to green infrastructure. Green infrastructure should be located on the parts of

the site richest in natural capital assets and that provide the most ecosystem services. We recommend the assessment of natural capital and ecosystem services provided by the site and the location of green infrastructure based on these results.

### **Groundwater**

According to the document provided land contamination will be scoped out. This is acceptable since it is a greenfield site. In addition in Appendix 3 there is a land contamination assessment based on some Hyder site investigation in 2010 and a further study by ST Consult carried out in 2014 which did not highlight any particular areas of concern with respect to groundwater quality. It is unlikely given the current use of the site that conditions will have changed much in the interim.

The only issue to raise going forward is that groundwater levels were identified as being from 0.6 to 5.4m below ground level. In the main report it mentions a burial ground. Depending on the exact location of this, these high groundwater levels could pose a challenge to meeting Environment Agency requirements which need a minimum of 1 metre unsaturated zone below the base of burials all the year round.

### **Final Comments**

We are reliant on the accuracy and completeness of the reports in undertaking our review, and can take no responsibility for incorrect data or interpretation made by the authors.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours sincerely

Kirsty Macpherson on behalf of  
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