

Planning

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27 August 2021

Dear Sir/Madam,

Thames Valley Flood Scheme Sustainability Appraisal Scoping Report

Thank you for providing South Oxfordshire and Vale of White Horse District Councils with the opportunity to comment on the Thames Valley Flood Scheme Sustainability Appraisal Scoping Report. Thank you also for extending the deadline for us to prepare a response.

Please find our responses to the relevant consultation questions below:

Question 5 - In Section 3 of the Sustainability Appraisal Scoping Report you can see a review of the regulations, policies and plans we have considered in creating the sustainability objectives. Are there any others we should be aware of?

National Planning Policy

Paragraph 3.4.5 refers to the National Planning Policy Framework (NPPF) published in 2019. A revised NPPF was published on 20 July 2021.

We question whether national Planning Practice Guidance (PPG) should be referenced alongside the NPPF. The PPG provides further detail on the implementation of the NPPF and it is intended that the two be read together.

The emerging Oxford-Cambridge Arc Spatial Framework is referenced at paragraph 3.4.7. It should be noted that the Spatial Framework will form national planning policy and transport policy for the Arc area. Consultation on a Draft Spatial Framework is expected to be undertaken in Autumn 2022, with the publication and implementation of the final framework shortly after.

The Oxfordshire Plan 2050

Appendix B1 identifies spatial plans produced by ‘upper-tier’ and ‘single tier’ authorities. The Oxfordshire Plan 2050 is identified in this context. We would make the following comments:

- The Oxfordshire Plan is being produced by the five Oxfordshire city and district councils¹, working in close partnership with Oxfordshire County Council and other partners. It is not an Oxfordshire County Council plan. However, we consider it appropriate to include the Oxfordshire Plan in Appendix B1 due to its significance as a long-term, strategic, county-wide plan for Oxfordshire, with appropriate clarifications.
- The Oxfordshire Plan is currently at the options stage of the plan-making process. A draft plan is not expected to be published for consultation until Spring 2022. Referring to this as an ‘emerging’ plan, rather than a ‘draft’ plan, would be more accurate.
- Ambitious policy options for the Oxfordshire Plan have been developed around five core themes:
 - i. Addressing climate change
 - ii. Improving environmental quality
 - iii. Creating strong and healthy communities
 - iv. Planning for sustainable travel and connectivity
 - v. Creating jobs and providing homes

These themes have been shaped by the Oxfordshire Plan’s draft vision and objectives. There are synergies between many of these themes and the ambitions of the Thames Valley Flood Scheme.

It is expected that the Oxfordshire Plan will be adopted in Summer 2023 (subject to the Planning Inspectorate’s timetable and the plan being found sound at examination). It is therefore expected that the Oxfordshire Plan will form part of the adopted local development plan during the later stages of the Thames Valley Flood Scheme project, when preferred approaches are being considered and detailed plans are being developed.

The Oxfordshire Plan will establish the level of growth to be delivered in Oxfordshire to 2050, as well as the overarching strategy for distributing growth across the county. The Thames Valley Flood Scheme should take appropriate account of growth proposed through the Oxfordshire Plan.

Local Plans

Paragraph 3.7.1 states that only adopted local development plans are identified at the scoping stage and that emerging local plans will be considered when locally specific approaches are identified.

We would highlight that South Oxfordshire and Vale of White Horse District Councils have agreed to produce a joint local plan. The timetable for preparing the joint local plan (as set out in the adopted Local Development Scheme) is as follows:

¹ Cherwell District Council, Oxford City Council, South Oxfordshire District Council, Vale of White Horse District Council and West Oxfordshire District Council.

Regulation 18 consultation (issues and options) – Summer 2022
Regulation 19 consultation (draft plan) – Summer 2023
Plan submitted for examination – January 2024
Adoption – Autumn 2024 (subject to the Planning Inspectorate’s timetable and the plan being found sound at examination)

It is therefore expected that the Joint South and Vale Local Plan will be the adopted local development plan during the later stages of the Thames Valley Flood Scheme project, when preferred approaches are being considered and detailed plans are being developed.

We will engage constructively, actively and on an ongoing basis with the Environment Agency throughout the plan-making process in accordance with the Duty to Co-operate. We would welcome the opportunity for more detailed discussions with the Environment Agency should potential flood management schemes be considered within, or where they might have impacts on, South Oxfordshire and/or the Vale of White Horse.

We note that Appendix B1 references adopted local plans across the Thames Valley area. We would clarify that the Vale of White Horse Local Plan Part 1 was adopted in December 2016 and that the Local Plan Part 2 was adopted in October 2019.

We also note that Figure 3.2 labels Oxford as ‘Oxford District’. This should be ‘Oxford City’.

Other Plans

Thames Water’s Water Resource Management Plan (WRMP) 2020-2100 is identified at paragraph 3.5.1. It should be noted that a new WRMP is expected to be adopted during the lifetime of the Thames Valley Flood Scheme project.

It should also be noted that a Regional Resilience Plan is being produced for the South East, which will provide a framework for future WRMPs and water supply investment.

A range of strategic water resource options are being considered by Thames Water and the wider Water Resources South East partnership. A number of options may have impacts on the storage and/or movement of water in the Thames Valley area. Appropriate account should be taken of any potential impacts and/or opportunities arising from these options on the Thames Valley Flood Scheme project. Engagement with Thames Water and relevant local authorities is likely to be required.

Plans Not Considered

Opportunities to align with Local Nature Recovery Strategies (as they emerge) should be considered to ensure that wider environmental opportunities and benefits are realised.

Question 6. In sections 4 and 5 of the Sustainability Scoping Report we have presented information on the current state of the catchment in social, economic and environmental terms.

6a. Have we considered the right information at this stage of the Sustainability Appraisal?

Yes

6b. Do you think we should consider any additional information in assessing the likely impacts of the scheme?

Yes

Please explain your answer:

Given the nature of the Thames Valley Flood Scheme project, there could be greater emphasis on matters of specific relevance to the River Thames and its tributaries, in addition to more general contextual information about the Thames Valley area.

For example, many sites of international and national biodiversity importance have close relationships with the River Thames and its tributaries.

Water-based sports and recreational activities (such as swimming, paddle boarding, and kayaking) are also an important use of the river which should be given greater consideration. Activities such as punting and rowing are a key part of Oxfordshire's cultural heritage and identity. Water-based sports and recreational activities are also a key element of Oxfordshire's tourism offer, which includes the world-renowned Henley Regatta.

As the project progresses, and more focused locations are identified, there may be opportunities to consider local plan evidence bases, particularly Strategic Flood Risk Assessments and Water Cycle Studies.

7. The objectives are listed in section 6.2 of the Sustainability Appraisal Scoping Report.

7a. If we met these objectives, do you think the scheme would be sustainable, that is would it meet the needs of the present without compromising the needs of future generations?

Yes – subject to the comments below and the response to Question 8.

Please explain your answer:

We would make the following comments in relation to the objectives identified:

Topic: Population and Human Health

Objective 4: To enhance access to and provision of quality greenspace.

We note that there is significant overlap between this objective and the access and recreation topic.

Topic: Access and Recreation

Objective 8: To support the provision of new green-blue infrastructure

Objective 8 is very broad and could refer to the delivery of a wide range of social, environmental and economic benefits. We would question whether this objective should be made more specific to the topic area by emphasising public accessibility and/or the provision of recreational opportunities. Current access to the River Thames is extremely limited and river users are concentrated in specific locations.

Topic: Biodiversity

Opportunities to connect/expand habitats and to support nature recovery should be recognised.

Topic: Water

Objective 16: To protect the status of surface and groundwater bodies

This objective should also seek to improve the quality of surface and groundwater bodies where possible.

Topic: Air Quality

Objective 21: To minimise impacts to Air Quality for the local and wider community and improve where possible

As well as considering air quality impacts on human health, we would also suggest that air quality impacts on the natural environment should be considered.

Topic: Climate Change

It is important that the objectives/criteria recognise the need to manage high temperatures and to help other species adapt.

Topic: Resource Use and Waste

Objective 24 - To reduce the risk of flooding to resource and waste sites.

The draft criteria associated with Objective 24 limits the interpretation of 'waste sites' to landfill and historic landfill. We would suggest that the criteria should interpret waste sites more broadly, to include uses such as recycling facilities, in line with national Planning Practice Guidance².

7b. Are there any further objectives that you think should be included?

Yes.

² Ministry of Housing, Communities and Local Government; Planning Practice Guidance; Waste; What matters come within the scope of 'waste development'; Paragraph: 002; Reference ID: 28-002-20141016; Revision date: 16 10 2014.

Please explain your answer:

We consider that an additional objective is needed under the access and recreation topic which seeks to ensure that recreational opportunities are accessible by sustainable modes of travel (walking, cycling and public transport). This is particularly important given that one of the stated project objectives is to create new recreational assets of regional significance, which could draw a significant number of people from a wide area. The development of a scheme where accessibility is car dependent would not be sustainable.

An objective related to reducing the risk of flooding to businesses should also be added under one of the economic topics. This would be consistent with other areas of the assessment framework, for example Objectives 2 and 6.

As this project is specifically focused on reducing the risk of river flooding, we would question whether there should be an objective related to opportunities to support the management other types of flood risk.

As currently drafted, the access and recreation objectives do not recognise the importance of maintaining/improving access to water-based sports and recreational activities (such as swimming, paddle boarding, rowing and kayaking).

8. Have we identified the right topics to include in the Sustainability Appraisal?

Yes.

9. Do you have any additional comments or feedback you would like us to consider?

No.

We trust that these comments are helpful. Please contact us using the details above should you wish to discuss them further.

Yours Sincerely,

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South Oxfordshire and Vale of White Horse District Councils