Dear Sir/Madam

Oxfordshire Minerals and Waste Local Plan: Part 1 – Core Strategy
Proposed Submission Document, August 2015
Town and Country Planning (Local Planning) (England) Regulations 2012 (Reg. 19)

Thank you for your consultation, which we received on 18 August 2015.

We have no comments to make with regard to the Core Strategy.

We have the following comments on the Strategic Flood Risk Assessment (SFRA).

We note that as agreed this document does not include the Sequential Test but provides the flood risk data to allow it to be undertaken. The current Core Strategy documents only identify broad areas so this seems an appropriate level of assessment at this stage. The Sequential Test will need to be undertaken during the site allocation process through an updated Level 1 SFRA once details of possible site allocations are available, as this document recommends. That document should also recommend whether a Level 2 SFRA is required.

Level 2 SFRAs should take account of all sources of flooding, so the Exceptions Test may still be required even if all sites are to be located outside Flood Zone 2 and 3 (fluvial flooding), if the proposed allocations have a high risk of flooding from other sources.

PGG also advises that a Level 2 Strategic Flood Risk Assessment should reduce burdens on developers, in particular, at windfall sites, in the preparation of site-specific flood risk assessments.
In Appendix F, G and H additional numbers appear on the blank pages which look like a repeat of the site areas. We suggest these are deleted for clarity.

Yours faithfully

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