



**OXFORDSHIRE
COUNTY COUNCIL**

**County Hall
New Road
Oxford
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**Director for Planning and Place
– Susan Halliwell**

21 June 2019

Wheatley Neighbourhood Plan Committee
By email: responseswnp@gmail.com

Copy: planning.policy@southoxon.gov.uk

Attn: John Fox

Dear Wheatley Neighbourhood Plan Committee

Wheatley – Pre-Submission Draft Neighbourhood Plan (comments to 21/6/19)

Please see attached comments on the Pre-Submission Draft Neighbourhood Plan. Our comments follow those sent on 30 June 2017 on your first draft neighbourhood plan and our letter of 9 October 2018 in respect of some further questions.

We note that there has been an appeal lodged on the refusal of P17/S4254/O at Wheatley Campus.

We have prepared these officer comments in good faith, but these comments do not restrict our ability to raise matters at the formal Submission stage of your Neighbourhood Plan.

Yours sincerely

L Hughes

Lynette Hughes
Senior Planner

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District: South Oxfordshire District Council
Consultation: Wheatley Neighbourhood Plan - Second Pre-Submission Draft
Team: South & Vale Locality Team
Officer's Name: Lynette Hughes
Officer's Title: Senior Planner
Date: 21/06/2019

Strategic Comments

Since the initial pre-submission draft neighbourhood plan which we commented on in 2017, some changes have been made but many aspects are similar.

Overall, we consider the draft neighbourhood plan to be well researched and the aspirations sound. We are aware that there is local concern about the possible route of the Oxford-Cambridge Expressway, but agree that the draft Neighbourhood Plan is correct not to raise this given that there are currently two corridor options around Oxford and we await Highways England's consultation scheduled for Autumn 2019.

The neighbourhood plan boundary has not changed and includes all of Wheatley Parish and part of Holton Parish. It remains the case that not all of the Oxford Brookes University Wheatley Campus site is covered in this neighbourhood plan.

The Submitted Local Plan policy STRAT14 proposes allocation of the whole Wheatley Campus site and its removal from the Green Belt. Policy SPOBU (p44) appears to be phrased so that there is no conflict with the Submitted Local Plan.

Application P17/S4254/O for up to 500 homes on the Wheatley Campus site was refused in December 2018. An appeal by Oxford Brookes University has been recently lodged on that refusal. The neighbourhood plan steering group should have regard to the matters raised in that appeal prior to progressing to submitting this neighbourhood plan.

Land within the village is inset from the Green Belt. Policy H4 (p33) allows for infill in accordance with the Local Plan. Policy SPES2 (p52) allows for redevelopment of the Littleworth industrial area (WHE22) within the village for 25 houses. It is not clear whether the land is proposed as a Neighbourhood Plan allocation, and we consider this should be clarified.

Policy STRAT6 of the Submitted Local Plan allows for additional land to be taken out of the Green Belt at Wheatley through the neighbourhood plan. Policy GBBA1 (p48) proposes to amend the boundary at the eastern edge of the village but notes that this will only come into effect when the strategic policy in the Local Plan is adopted. Policy SPES1 (p50) supports development of up to 10 houses on land identified as WHE16. Policy SPES3 (p54) supports a mixed development including approximately 55 houses on WHE15. Policy SPES4 (p55) supports commercial use on WHE17. Again it is not entirely clear whether the three sites are being allocated; although the term 'allocations' is used Policy GBBA1, it is not used in Policies SPES1, SPES3 and SPES4.

As stated in our June 2017 response on your then draft neighbourhood plan, we have concerns about whether the proposals which envisage industry moving from the Littleworth industrial area to the eastern edge of the village will be financially viable and therefore achievable.

There are no current exclusions from the CIL Charging Schedule for any of the sites proposed for allocation at Wheatley and therefore development is CIL liable. There are limits as to what can be sought through S106 and S278 in the current system. We will seek to work with the District Council on a review of the CIL Charging Schedule.

We would refer you to our response on the Pre-Submission Local Plan in February 2019. The comments on the Pre-Submission Local Plan should be taken into account if they haven't been already before progressing to submitting this neighbourhood plan.

Of particular relevance is our comment 78 in the table where we advised the District that we would consider the matter of the proposed additional development due to Green Belt release at the neighbourhood plan stage. Our principal concern, as set out in our letter to you of 9 October 2018, is with the quantum of development in relation to education capacity. The quantum is some 90 houses, in addition to that proposed at Wheatley Campus for which there is an appeal seeking 500 houses. This total level of development is one which could lead to capacity concerns as set out in our Education comments.

Some other relevant excerpts from our response are as follows:

Para 49: The Wheatley Campus site, which was included in the 2017 Proposed Submission Local Plan, has already been the subject of a planning application (P17/S4254/O) which was refused in December 2018. The County Council's initial highways objections were largely resolved before the application was considered by the District's Planning Committee. Although we maintain transport and education concerns about this site allocation and query the potential for early delivery given the refusal, the County Council has no objection to the principle of redeveloping this brownfield site.

Table point 79: 4.126 Wheatley. The County Council supports the recognition of development capacity constraints in Wheatley due to primary school capacity. However, the text of this paragraph which includes: 'there is limited potential for primary school provision to be extended at present' is slightly misleading, as it is not thought viable to expand the primary school. The school's existing accommodation is expected to be able to meet the needs of around 300 new homes. Replace: 'There is limited potential for primary school provision to be extended at present' with: 'There is a limit to how many additional pupils it would be feasible for the village primary school to accommodate'.

Table point 80: Concept Plan Wheatley Campus. The concept plan shows a large area of green infrastructure to the west, but the reason for that is not apparent, apart from the Scheduled Monument. Nevertheless, the County Council is aware of the issues which have been raised through the refused planning application for development of this site P17/S4254/O. The reason for the large area of green

infrastructure should be clear in the text if this concept plan is to remain unchanged. Revise so that the text and concept plan are consistent.

Table point 81: STRAT14 Wheatley Campus. The County Council's November 2017 comments requested that 'approximately' 300 homes be referred to, rather than 'at least' or that another approximate number be identified. The recent planning application for 500 homes was refused. A number larger than 300 homes will better support a bus service becoming commercial and potentially better fund other items of infrastructure, therefore the County Council agrees that a higher number is desirable, subject to there being education capacity in the village. Change 'at least 300 homes' to an approximate number of homes, consistent with other allocations. The number should be identified in conjunction with the developer and other interested parties, having regard to infrastructure requirements and education capacity.

Table point 82: STRAT14, 2 Wheatley Campus. The text currently requires cycling and walking links to the centres of Holton and Wheatley and to the primary school. The County Council supports links to the centre of Wheatley and considers it necessary to have cycling and walking links leading to additional areas in Wheatley such as employment areas, but does not consider it necessary to have cycling and walking links to Holton given that the only facility there is the Holton village hall. Consideration should be given to specifically mentioning public rights of way, consistent with other policies. Include a requirement for cycling and walking links to areas of employment in Wheatley. Consider deleting the requirement for cycling and walking links to the centre of Holton. Consider additional specific reference to contributions to improve public rights of way on site and in the vicinity.

Table point 83: Policy STRAT14 – 3 Wheatley Campus. This part of the policy sets out the masterplan requirements, but does not sufficiently address transport and movement matters within the site. Add: 'v) high quality walking and cycling routes within the site; vi) provision of infrastructure to support public transport through the site.'

Table point 148: Infrastructure Delivery Plan App 2.7 - Infra: Wheatley WHE06. WHE06 includes: 'OCC has stated that school capacity can accommodate up to 500 new households but there are concerns over development beyond this number.' This is not correct, although it is correct that considering all relevant matters, an objection was not raised on an application for 500 new homes. Current pupil forecasts suggest that the pupil generation from 500 new homes would be likely to exceed the expected spare capacity which would be available, but forecasts are updated on an annual basis, reflecting changes in underlying demographics as well as housing growth. Change to 'OCC has stated that school capacity can accommodate around 300- 500 new households but there are concerns over development beyond this number.'

Table point 149: Infrastructure Delivery Plan App 2.7 - Infra: Wheatley WHE06. WHE12 details improvements to walking and cycling provision and includes the text: 'To include a range of improvements to upgrade pedestrian/ cycle access to site. Specifics to be agreed with the County Council, including but not limited to new crossing facilities, drop-kerb improvements, footway widening, street lighting upgrades, new signage, and footway improvements on the A40 Holloway Road overbridge.' This list is not complete. To include all improvements presently identified

by Oxfordshire County Council, the text should be changed to: 'To include a range of improvements to upgrade pedestrian/ cycle access to site. Specifics to be agreed with the County Council, including but not limited to improvements to:

- walking and cycling provision on A40 overbridge and provision of a zebra crossing to the north of Park Hill/London Road/Holloway Road roundabout;
- the Park Hill/London Road/Holloway Road roundabout for all modes;
- pedestrian crossing facility on Church Road to the west of Holloway Road junction;
- widening of footway on northern side of Littleworth Road;
- cycling facilities at Holton turn and at western access to site (Holloway Road);
- improvements to cycleway on northern side of A40;
- widening of existing footway on Waterperry Road;
- provision of street lighting along A40 underpass and along the Old London Road (east);
- new pedestrian crossing on Waterperry Road near junction with Old London Road;
- new footway along Old London Road between junctions with Waterperry Road and London Road;
- widening of existing footway on northern side of London Road eastwards of junction with Old London Road;
- provide appropriate pedestrian crossing facility over London Road;
- widening of existing footway along northern side of Old London Road from junction with Waterperry Road westwards to junction with London Road;
- relocation of the zebra crossing on London Road to the west of Anson Close and removal of the informal crossing;
- other improvements to signage and provision of dropped kerbs where appropriate.'

It is noted that in respect of the last two comments above, changes were made to the Infrastructure Delivery Plan and the relevant points in the revised March 2019 Infrastructure Delivery Plan were changed to read as follows:

WHE06 – 'OCC has stated that school capacity can accommodate around 300- 500 new households but there are concerns over development beyond this number. At present the development would generate a CIL contribution towards infrastructure which can be used to fund future education needs.'

WHE12 – 'To include a range of improvements to upgrade pedestrian / cycle access to site. Specifics to be agreed with the County Council, including but not limited to improvements to: walking and cycling provision on A40 overbridge and provision of a zebra crossing to the north of Park Hill/London Road/Holloway Road roundabout; the Park Hill/London Road/Holloway Road roundabout for all modes; pedestrian crossing facility on Church Road to the west of Holloway Road junction; widening of footway on northern side of Littleworth Road; cycling facilities at Holton turn and at western access to site (Holloway Road); improvements to cycleway on northern side of A40; widening of existing footway on Waterperry Road; provision of street lighting along A40 underpass and along the Old London Road (east); new pedestrian crossing on Waterperry Road near junction with Old London Road; new footway along Old London Road between junctions with Waterperry Road and London Road; widening of existing footway on northern side of London Road eastwards of junction with Old London Road; provide appropriate pedestrian crossing facility over London Road; widening of existing footway along northern side of Old London Road from junction with

Waterperry Road westwards to junction with London Road; relocation of the zebra crossing on London Road to the west of Anson Close and removal of the informal crossing; other improvements to signage and provision of dropped kerbs where appropriate.'

District: South Oxfordshire District Council
Consultation: Wheatley Neighbourhood Plan - Second Pre-Submission Draft
Team: South & Vale Locality Team
Officer's Name: Will Pedley and Kt Hamer
Officer's Title: Senior Transport Planner and Principal Transport Planner
Date: 03/06/2019

Comments

We support the aspirations of the draft neighbourhood plan to improve connectivity, particularly in respect of walking and cycling.

Page 30 – Policy H1: Design and Character Principles

This policy states that development proposals will be supported if they appropriately address a list of principles, one of which listed under point 'g' is that "They will not require culverts for the existing ditches". However, there could be a scenario in which the culverting of a ditch facilitates the provision of walking and cycling improvements that may otherwise be undeliverable. We therefore suggest that this is reworded to say, "They will not require culverts for the existing ditches, unless there is a demonstrable benefit to walking, cycling, highway safety, or access."

Page 34 – Policy P1: Parking Provision

This policy begins "Parking needs to be delivered in accordance with the adopted standards." It is suggested that this references the standards more specifically. Therefore, we recommend the wording is amended to say "Parking needs to be delivered in accordance with the adopted standards as set out by Oxfordshire County Council in [Parking Standards For New Residential Developments \(2011\)](#) and South Oxfordshire District Council."

Page 34 – Policy T1: Impact of Development on the Road Network

This policy should include reference to OCC's guidance on Travel Plans, which can be found [here](#). It is recommended that additional text is included in this policy reading, "Travel Plans should be submitted in accordance with the guidance set out by Oxfordshire County Council in [Transport Assessments and Travel Plans \(2014\)](#)."

Page 35 – paragraph 8.13

This paragraph refers to a possible future study in collaboration with County Highways and lists a number of schemes to be developed. The aims of the study and aspirations for Wheatley referred to are appreciated. However, there is unfortunately no funding from the authority for such a study, so this would need to be funded through alternative means. Any measures identified, if deemed appropriate, would also need funding. This is likely to be from the parish's CIL receipts or, subject to the appropriate regulatory tests, S106 or S278 may also provide a suitable source for delivery.

Page 44 – Policy SPOBU – WHE25

This policy states that proposals will be supported if they adequately address a list of requirements. Under point 'e' it states:

"Enhanced integration and access between Wheatley and the site particularly through;

- a. Improved and, where necessary, additional, pedestrian and cycle access.
- b. Improved public transport.
- c. Pavement upgrading.”

This policy wording is supported by OCC. We recommend that this policy should also include the following, “d. The movement network internal to the site, and any off-site improvements directly-related to the site, should be designed in accordance with Oxfordshire County Council’s [Walking Design Standards 2017](#) and [Cycling Design Standards 2017](#).”

Point ‘f’ reads: “Highway and junction improvements to ensure that the development is serviced by adequate access roads and;

- a. have no severe impacts on traffic congestion or provide adequate mitigation
- b. provides improved vehicle management for London Road and Old London Road”

It is not clear what is meant by “improved vehicle management”. It would be helpful for greater clarity to be provided on this matter, mindful that any requirements will need to be compliant with the three regulatory CIL tests, these being:

- a) necessary to make the development acceptable in planning terms
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development.

Page 54 – POLICY SPES3 – WHE15

It would be helpful for this policy to stipulate some design requirements for the Green Route. It is therefore suggested that an additional point be added that reads, “i. The ‘Green Route’ should be surfaced appropriately for use by pedestrians and cyclists in all weathers, be designed to a suitable width for both user groups and incorporate appropriate lighting.”

Policy SPES1:

This policy allocates WHE16 for up to 10 houses. The site would be accessed via the existing access from London Road. In principle from a transport perspective, this site looks suitable, however, it would be subject to being able to demonstrate suitable visibility splays, which are justified with speed surveys. The access will need to be upgraded and have suitable crossing points for pedestrians walking to Asda.

Consideration will have to be made for the bus stop to the east of the access, as this may have implications for the safety of the access. The highway boundary must be checked at the access, as it appears to only contain three quarters of the existing access bell mouth.

The site will need to demonstrate how ad-hoc parking from vehicles associated with the business park and other commercial uses nearby, is controlled, to ensure the safety of the residents.

The site must have good connectivity with the centre of the village for pedestrians and cyclists.

Policy SPES2:

This policy allows for redevelopment of the Littleworth industrial area within the village for 25 houses. The industrial use of the site is intended to be transferred to the eastern end of the village, which appears a more appropriate site.

Point 'g' states that the area of adjoining road will act as provision for resident parking for use by designated terrace houses and flats neighbouring the development on north side of Littleworth Road. Whilst this arrangement seems ok in principle, further consideration must be given to whether this would meet the CIL Regulation 123 tests, given the spaces would not be for residents associated with the site itself.

The visibility at the access would have to be demonstrated and if the site frontage is proposed for car parking, this will have to be carefully managed, so as not to obstruct sight lines.

Point 'f' about linking in to the footpath that links to Coopers Close, must give further clarification about how cyclists are to be catered for.

Policy SPES3:

This policy allocates WHE15 for a mixed development including approximately 55 houses. An access off the London Road, is okay in principle, however, it must not be too close to the junction with Old London Road and it will be subject to DMRB standards when determining the visibility splays, given that the London Road is a busy through Road with access to the A40 at both the western and eastern end of the village.

I have concerns that the access will be overly engineered for the residential element of the site, because of the commercial element, which poses a conflicting interest and will need to be considered with any planning application. Having the commercial access from the existing internal road would be more suitable.

More clarification must be provided regarding the 'Green Route' and how it is to be made a suitable pedestrian connection for pedestrians and cyclists, including adequate all-weather surfacing, width to accommodate both users and appropriate lighting.

The site will need to demonstrate how ad-hoc parking from vehicles associated with the business park and other commercial uses nearby, is controlled, to ensure the safety of the residents.

Policy SPES4:

This policy allocates WHE17 for commercial use. See the comments above associated with SPES3.

Page 31 – paragraph 8.5.

There is mention of a 'design brief'. This should be changed to say, 'Design and Access Statement', which is more in keeping with typical document names associated with the planning process.

District: South Oxfordshire

Consultation: Wheatley Parish Neighbourhood Plan 2019 - 2033 (Pre-Submission Document)

Team: Archaeology

Officer's Name: Richard Oram

Officer's Title: Planning Archaeologist

Date: 20-5-19

Comments

The plan does not contain any policy for the protection of the Historic environment as set out in the NPPF. We would recommend that a policy for this is added to the Quality of the Environment and Natural Landscape section such as that following.

Policy - Historic Environment

The parish's designated historic heritage assets and their settings, both above and below ground including listed buildings, scheduled monuments and conservation areas will be conserved and enhanced for their historic significance and their important contribution to local distinctiveness, character and sense of place.

Proposals for development that affect non-designated historic assets will be considered taking account of the scale of any harm or loss and the significance of the heritage asset as set out in the National Planning Policy Framework (NPPF 2012).

District: South Oxfordshire

Consultation: Wheatley Parish Neighbourhood Plan 2019 - 2033 (Pre-Submission Document)

Team: Children, Education and Families

Officer's Name: Jackie Goodwin

Officer's Title: Housing Development Officer

Date: 30 May 2019

Comments

We support the proposed provision of affordable housing in Wheatley and in addition would encourage the provision of properties available at a social rent. These could be individual units or Houses of Multiple Occupation. There is a need for realistically priced accommodation for local vulnerable young people, including care leavers, in areas with transport links to education and job opportunities. There is also a need for genuinely affordable housing in properties of 2 or 3 bedrooms for rent by local families on low incomes.

District: South Oxfordshire

Consultation: Wheatley Parish Neighbourhood Plan 2019 - 2033 (Pre-Submission Document)

Team: Education

Officer's Name: Joanne Booker

Officer's Title: School Organisation Officer

Date: 30 May 2019

Comments

Capacity of the primary school

The Neighbourhood Plan states that 'Wheatley Primary Academy has accommodation for further pupils', but the school's capacity numbers are not specified. The school is a 2 form entry school (capacity 420) with 265 pupils on roll at the time of the January 2019 pupil census. As noted in the county council's letter on 9 October 2018 in response to questions from the Neighbourhood Plan Committee, while the school is likely to have capacity to accommodate development of less than 500 homes in the Wheatley area, any additional housing above this number may create capacity issues.

As previously advised in the county council's response to the Local Plan in February 2019, it is expected that new primary school pupils generated from housing development will attend Wheatley Primary School, so further clarity is required on anticipated housing numbers due to limited capacity at the school. This is because, as also noted in our Local Plan response, expansion of the primary school is not considered to be viable.

Redevelopment of the primary school

Paragraph 8.14 refers to the possibility of redeveloping Wheatley Primary School for educational use to include provision of a new village hall. Any such proposal should be carefully considered to ensure that the school site is sufficient to meet the needs of the local population and to accommodate pupil generation from planned housing development. Furthermore, it is not clear how such a proposal would be funded, and it should also be noted that any building on academy playing fields requires DfE approval.

Paragraph 8.32 refers to the potential of a photovoltaic project being carried out by Wheatley schools. As previously advised, discussions should be held with the county council's Property team about any such proposal.

Capacity of the secondary school

Paragraph 4.11 states that 'Wheatley Park, with 1019 pupils on roll in March 2016, believes it has accommodation for 180 more pupils; Ofsted disputes this and suggests a figure of 330 more places.' This statement could be updated to reflect the school's current capacity of 1350 pupils, and pupil census figures from January 2019 which show that 1076 pupils were on roll at this time, meaning that there would be additional capacity for 274 pupils across the age range.

As previously advised, it is expected that Wheatley Park would be able to accommodate the suggested levels of growth in the village, if its full capacity were to be utilised.

As the school is also an academy, the capacity is set out in the funding agreement and would need DfE approval to be altered.

District: South Oxfordshire District Council
Consultation: Wheatley Neighbourhood Plan - Second Pre-Submission Draft
Team: Infrastructure Funding
Officer's Name: Geri Beekmeyer
Officer's Title: Infrastructure Funding Negotiator
Date: 03/06/2019

Comments

Para 8.14 continues to refer to redevelopment of the Wheatley Primary School (WHE27) site for educational use to include, if possible, the provision of a new village hall.

Issues of concern here are i) the site capacity to provide for any expansion; and ii) funding.

Please see Education comments.

Para 8.16 says 'Community facilities wishing to apply for renewal utilising S106 [40] or CIL [41] funds should register with Wheatley Parish Council. '

The Parish Council should be aware planning obligations can only be sought to make a development proposal acceptable in planning terms ie mitigate its impact, but cannot be used to address existing infrastructure deficiencies.

District: South Oxfordshire

Consultation: Wheatley Parish Neighbourhood Plan 2019 - 2033 (Pre-Submission Document)

Team: Environment Strategy

Officer's Name: Nick Mottram

Officer's Title: Environment Strategy Manager

Date: 30 May 2019

Comments

The inclusion of reference to the Conservation Target Area is welcome. However, Figure 8.6 whilst showing the Conservation Target Area does not include other features which are shown on the key and would be visible in this view e.g. Littleworth Brick Pits SSSI and the northern end of Coombe Wood ancient replanted woodland. As such it could be misleading.

There would still be merit in including a map showing the whole parish with the relevant habitat and environmental designation on it, to provide a better context.

District: South Oxfordshire

Consultation: Wheatley Parish Neighbourhood Plan 2019 - 2033 (Pre-Submission Document)

Team: LLFA

Lead Local Flood Authority

Detailed comments:

The [Sustainable Drainage Systems \(SuDS\) Policy](#), which came into force on the 6th April 2015 requires the use of sustainable drainage systems to manage runoff on all applications relating to major development. As well as dealing with surface water runoff, they are required to provide water quality, biodiversity and amenity benefits in line with National Guidance. The [Sustainable Drainage Systems \(SuDS\) Policy](#) also implemented changes to the [Town and Country Planning \(Development Management Procedure\) \(England\) Order 2010](#) to make the Lead Local Flood Authority (LLFA) a statutory Consultee for Major Applications in relation to surface water drainage. This was implemented in place of the SuDS Approval Bodies (SAB's) proposed in Schedule 3 of the Flood and Water Management Act 2010.

All full and outline planning applications for Major Development must be submitted with a Surface Water Management Strategy. A site-specific Flood Risk Assessment (FRA) is also required for developments of 1 hectare or greater in Flood Zone 1; all developments in Flood Zones 2 and 3 or in an area within Flood Zone 1 notified as having critical drainage problems; and where development or a change of use to a more vulnerable class may be subject to other sources of flooding.

Further information on flood risk in Oxfordshire, which includes access to view the existing fluvial and surface water flood maps, can be found on the [Oxfordshire flood tool kit](#) website. The site also includes specific flood risk information for developers and Planners.

The [National Planning Policy Framework](#) (NPPF), which was updated in February 2019 provides specific principles on flood risk (Section 14, from page 45). [National Planning Practice Guidance](#) (NPPG) provides further advice to ensure new development will come forward in line with the NPPF.

Paragraph 155 states; *“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”*

As stated in Paragraph 158 of the NPPF, we will expect a sequential approach to be used in areas known to be at risk now or in the future from any form of flooding.

The [Non-statutory technical Standards for sustainable drainage systems](#) were produced to provide initial principles to ensure developments provide SuDS in line

with the NPPF and NPPG. Oxfordshire County Council have published the “[Local Standards and Guidance for Surface Water Drainage on Major Development in Oxfordshire](#)” to assist developers in the design of all surface water drainage systems, and to support Local Planning Authorities in considering drainage proposals for new development in Oxfordshire. The guide sets out the standards that we apply in assessing all surface water drainage proposals to ensure they are in line with National legislation and guidance, as well as local requirements.

The SuDS philosophy and concepts within the Oxfordshire guidance are based upon and derived from the CIRIA [SuDS Manual \(C753\)](#), and we expect all development to come forward in line with these principles.

In line with the above guidance, surface water management must be considered from the beginning of the development planning process and throughout – influencing site layout and design. The proposed drainage solution should not be limited by the proposed site layout and design.

Wherever possible, runoff must be managed at source (i.e. close to where it falls) with residual flows then conveyed downstream to further storage or treatment components, where required. The proposed drainage should mimic the existing drainage regime of the site. Therefore, we will expect existing drainage features on the site to be retained and they should be utilised and enhanced wherever possible.

Although we acknowledge it will be hard to determine all the detail of source control attenuation and conveyance features at an outline stage, we will expect the Surface Water Management Strategy to set parameters for each parcel/phase to ensure these are included when these parcels/phases come forward. Space must be made for shallow conveyance features throughout the site and by also retaining existing drainage features and flood flow routes, this will ensure that the existing drainage regime is maintained, and flood risk can be managed appropriately.

Officer's Name: Adam Littler
Officer's Title: Drainage Engineer
Date: 03 June 2019
