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A Personal Blog

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Matter 10 - Issue 4- Flood Risk and Sustainable Drainage – Policies G7 and G8

Q2 What is the justification for setting out the requirements for surface water runoff in Policy G8? Would this apply to all development proposals, and if so, is the approach proportionate?
Q3 Is the requirement for compliance with external guidance in Policy G8, which falls outside the scope of the development plan, justified?

Response

Please refer to:

138 - 138___Mark_Pott_on_behalf_of_Headington_Heritage_Redacted.pdf p.103 ff]

Yes, The high ground around Oxford is both the source of flooding downstream in lower lying parts of the city and beyond downstream in the Thames catchment. [138 – p.24].

Of particular concern, is the scouring effect of the Thames Water drain which emerges from the head of the Lye Valley which incises the base of the Lye Valley leading to desiccation of the northern fen as the water drains more quickly. [138 – p.49 ff]

In addition, the water which goes in the drain does not infiltrate into the ground, reducing the calcareous flows on which the fen depends.

This drain, and other inputs into the Lye Valley from large scale development at the Nuffield, Churchill, Warneford and Old Road Campus leads to scouring of the South Fen and downstream flooding at Cowley Marsh. The creation of large scale basement structures has exacerbated the issue as it reduces groundwater storage.

Article 4 directions are required for all development in the Lye Valley as the cumulative effects of permitted development is reducing groundwater flows and increasing destructive surface flows via drainage. [138 – p.117]

The approach is therefore not only proportionate for all of Oxford, but particularly for the catchment areas (surface and ground) of the Lye Valley, but should be extended to all permitted development.

Oxford has NOT published:
The City Council has published additional guidance in relation to the Lye Valley that applicants should refer to where applicable. (LP2045 p.76)

As no TAN is extant. Even if it were, guidance does not set clear requirements, and the:

GRE.018 Lye Valley SSSI Hydrogeological Impact,Assessment report, BA Consulting June 2025
Is factually incorrect on a number of key points. *[138 p.103 ff]*

The policy is *ineffective* due to poor input data and a lack of clear guidance, most of the Policies seem to be parroting the NPPF.

A summary of requested modifications to G6/G7 and G8 can be found at [138 - p.25]

Other

Q3. An external guide outside the plan that would be justified is CIRIA *The SuDS Manual (C753)* the standard guide for SuDS design in the UK.

Many of the specifics of the SuDS design do not make sense:
Below ground features such as pipe systems or underground attenuation tanks will not be permitted.
SuDS comprise of exactly the above in most cases, they are not natural features and require these components to function, especially where there is insufficient space to employ other methods.