

## Planning

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Listening Learning Leading



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Dear Sir/Madam,

### **Draft River Basin Management Plans Consultation**

Thank you for providing South Oxfordshire and Vale of White Horse District Councils with the opportunity to comment on the draft River Basin Management Plans (draft RBMPs).

South Oxfordshire and Vale of White Horse are located within the Thames River Basin District and so the Councils have a specific interest in the Thames draft RBMP.

Please find the Councils' joint response to the consultation questions attached.

Yours Sincerely,

[REDACTED]  
[REDACTED]

South Oxfordshire and Vale of White Horse District Councils

# Draft River Basin Management Plans Consultation Response

## Implementing the plan

1. What are your views of these principles? When thinking about your answer, you may wish to consider how easy (or hard) you would find adopting the principles.

Taking action to address climate change is essential and should be prioritised. Both South Oxfordshire and Vale of White Horse District Councils have declared climate emergencies. The Councils therefore welcome the principles relating to minimising greenhouse gas emissions, maximising carbon capture and building resilience to climate change. However, it is suggested that stronger wording in relation to net zero should be considered.

The councils strongly support the restoration and recovery of the natural environment. It is suggested that this should be one of the first principles, rather than being at the end of the list. Potential interrelationships between RBMPs and forthcoming nature recovery strategies should be recognised.

There are a wide range of stakeholders that can affect and/or be affected by the quality of the water environment. A collaborative place-based approach to improving the water environment is therefore supported. However, it will be important that there are sufficient resources to enable/facilitate meaningful collaboration and to ensure that outcomes are delivered.

It is recognised that local planning authorities must, in exercising their functions, have regard to RBMPs. This includes the production of local plans. South Oxfordshire and Vale of White Horse District Councils are working together to produce a Joint Local Plan. Whilst the Joint Local Plan is in the very early stages of development, it is expected that addressing climate change and nature recovery will be key priorities, in accordance with the Councils' Corporate Plans. This would align with the proposed principles in the draft RBMP. The Councils will give appropriate consideration to the Thames RBMP in the preparation of the Joint Local Plan.

South Oxfordshire and Vale of White Horse District Councils are also working in partnership with the other local planning authorities in Oxfordshire (Cherwell District Council, Oxford City Council and West Oxfordshire District Council) to produce a Joint Statutory Spatial Plan known as the 'Oxfordshire Plan'. Improving environmental quality is a key theme for the emerging Oxfordshire Plan. Appropriate consideration will be given to the adopted and emerging Thames RBMP in the preparation of the Oxfordshire Plan.

## Environmental objectives

2. Do you agree with the environmental objectives in the draft plans?

Limited explanation is provided via the 'catchment data explorer' to explain why specific objectives and target dates have been proposed. It is therefore difficult to comment on whether the Councils agree with the environmental objectives proposed and to understand how achievable/ambitious the proposed objectives are. Clearer explanations of local targets should be provided to ensure that RMBPs are accessible and transparent.

## Programmes of measures

3. Are you aware of any funded measures that are missing from the programmes of measures?

No

Please let us know what measures are missing

N/A.

4. Do you have any comments on the potential new measures set out in the draft plans? Please tell us about any other new measures that could be taken forward with support from partners to achieve the objectives in the plans.

The Councils are extremely concerned about the many instances and high volumes of untreated sewage being discharged into rivers via storm overflows. This has serious implications for both nature and human health. There are concerns that this practice is occurring frequently in the Thames River Basin District. Measures to stop this practice should be a priority.

South Oxfordshire District Council is exploring the potential to achieve Bathing Water Status in the Thames at Wallingford, but all our river water quality is important.

## Working at the catchment level

5. Do you have any comments on the challenges and measures suggested as priorities in your local catchment partnership's page?

Please give catchment specific examples and tell us where, by working together, more benefits can be achieved.

South Oxfordshire and Vale of White Horse overlap a number of catchment and operational boundaries.

Most of the Vale of White Horse, and part of South Oxfordshire, fall within the Gloucestershire and the Vale Management Catchment, specifically the Ock Operational Catchment. It is noted that the most common reason for not achieving good status in the operational catchment is pollution from wastewater.

Most of South Oxfordshire is within the Thames and Chilterns South Management Catchment area. This is split into two operational catchments - Chilterns South (covering most of the southern part of South Oxfordshire) and Thame (covering most of the northern part of South Oxfordshire). It is noted that the most common reason for not achieving good status in the Chilterns South operational catchment is physical modifications and the most common reason for not achieving good status in the Thame operational catchment is pollution from wastewater, with pollution from rural areas and physical modifications also being significant issues.

The Councils are very concerned about pollution from wastewater, particularly instances of untreated sewage being discharged into rivers via storm overflows. Whilst the regulation of wastewater discharges is a matter for the Environment Agency, the Councils can assist in addressing this issue by ensuring that new development is appropriately phased to align with necessary wastewater treatment infrastructure upgrades, as well ensuring the use of SuDS to avoid surface water run-off from entering the sewage network. This approach is already applied in the adopted local plans for South Oxfordshire and Vale of White Horse, and opportunities to strengthen this approach through the new Joint South Oxfordshire and Vale of White Horse Local Plan, as well as the Oxfordshire Plan, will be considered. Engagement with Thames Water and the Environment Agency will be key in evidencing and applying this approach.

The Councils already have positive planning policies that seek to protect the setting and functions of waterbodies from inappropriate physical modifications and are supportive of opportunities to restore 'natural' waterbody systems (for example by de-culverting waterbodies and naturalising riverbanks). Again, opportunities to strengthen this through the new Joint South Oxfordshire and Vale of White Horse Local Plan, as well as the Oxfordshire Plan, will be considered.

If your response is regarding a specific catchment partnership page, please type the name below.

Gloucestershire and the Vale Management Catchment - Ock Operational Catchment.  
Thames and Chilterns South Management Catchment - Chilterns South and Thame operational catchments.

## Updating the plans

6. Do you have any further comments on the draft river basin management plans, not covered by the previous questions?

Consideration should be given to the potential impacts of major water resource infrastructure schemes currently being considered in the Thames River Basin District by Water Resources South East. These major schemes could have significant impacts in terms of water flows and water quality. Schemes being considered include a potential South East Strategic Reservoir Option (SESRO) proposed in the Vale of White Horse, as well as other options such as the transfer of water from the Severn. There are also risks that strategic water transfers could result in invasive species being brought into the Thames River Basin District.

Consideration should be given to the Oxford Flood Alleviation Scheme, located within Oxford City and Vale of White Horse, which will create a new stream with wetland wildlife corridor running through the existing flood plain to the west of Oxford. The scheme has a strong environmental vision and it is expected to deliver long term environmental benefits.

Whilst the use of online information and interactive mapping is welcomed, there is a need to look at multiple webpages to locate and interpret information within the draft RBMPs. The potential to make the final RBMPs easier to navigate and more user friendly should be explored, to ensure the information is accessible and transparent.