



South Oxfordshire and Vale of White Horse Joint Local Plan 2041

**Statement of Common Ground
between**

South Oxfordshire and Vale of White Horse District Councils

and the

Environment Agency

June 2026

1. Introduction

- 1.1. This Statement of Common Ground (SoCG) has been prepared by South Oxfordshire District Council and Vale of White Horse District Council (“the councils”) and the Environment Agency (“the EA”) hereafter referred to as “the parties”. It sets out matters that are agreed, and those that are not, between the parties in relation to the South Oxfordshire and Vale of White Horse Joint Local Plan 2041 (“the JLP”).
- 1.2. A SoCG related to the JLP was previously signed by the parties in June 2025 ([examination library reference LPA37](#)). That SoCG focused primarily on the parties’ positions in relation to the Strategic Flood Risk Assessment (SFRA) and the Water Cycle Study (WCS) at that point in time. A further SoCG has now been produced to provide an update on the parties’ positions on the SFRA and WCS following the further work and engagement that has been undertaken. This SoCG also provides further detail on matters not covered in the earlier SoCG, such as JLP policies (including site allocations), in particular where the EA had made a comment at the Regulation 19 stage.
- 1.3. The agreed matters in this SoCG do not preclude any further written or verbal representations that the parties may wish to make as part of the JLP examination in relation to matters which may not have been agreed and/or which do not form part of this SoCG.

2. Effective Cooperation with Prescribed Bodies

- 2.1. In accordance with paragraphs 24 to 27 of the National Planning Policy Framework (December 2023), the parties agree that they have engaged effectively and on an on-going basis during the plan-making process.

3. Flood Risk

Strategic Flood Risk Assessment

- 3.1. The parties agree that SFRA should be viewed as living documents, being kept up-to-date to reflect the latest information, as is best practice.
- 3.2. The JLP was supported by a Level 1 and Level 2 SFRA which were published at the Regulation 19 pre-submission publication stage ([examination library references CEQ11](#), [CEQ11.1](#), [CEQ12](#), and [CEQ12.1](#)). The councils have since updated their SFRA to take account of significant updates to the EA’s Flood Map for Planning made in March 2025, as agreed between the parties in the June 2025 SoCG. In updating the SFRA the councils have:
 - i. produced an addendum to the 2024 Level 1 SFRA that updates the functional floodplain delineation, site screening, and cumulative impact assessment ([examination library reference LPA44](#));
 - ii. produced a new Level 2 SFRA report, which supersedes the 2024 version ([examination library reference LPA45](#)); and
 - iii. re-applied the sequential test and, where necessary, the exception test ([examination library reference TBC](#)).

- 3.3. The councils engaged with the EA in updating the SFRA - seeking advice and agreement on the methodology and sharing draft outputs with the EA for review.
- 3.4. In mapping Flood Zone 3b (the functional floodplain), the Level 1 SFRA Addendum used the EA's Rivers and Sea 3.3% defended event flood risk extent and the buffered EA Statutory Main River Map (8 metres either side of the channel). Where there is no detailed modelled data included within the Rivers and Sea 3.3% defended event flood risk extent, it was assumed that this was covered by the EA's New National Model. The EA has since highlighted that the New National Model is being continuously improved and there are known issues in some areas, with a risk of further unidentified issues at a site specific level. To address this, the councils agree to undertake the following actions:
- 1) To further update the delineation of Flood Zone 3b in the SFRA, utilising a precautionary hierarchical approach to be agreed with the EA and the council's SFRA consultants.
 - 2) To include the following text within the SFRA in relation to the delineation of Flood Zone 3b:
"The Environment Agency has produced a defended 3.3% (1 in 30) annual exceedance probability (AEP) dataset to support conversations related to the Functional Floodplain. It is the responsibility of the developer to assess whether the 3.3% AEP extent shown on the Flood Map for Planning is suitable for use in a site-specific flood risk assessment. Where this extent is found to be unsuitable, a suitable definition of the functional floodplain must be agreed with the Environment Agency."
- 3.5. It is not expected that these updates will affect the deliverability of proposed JLP site allocations, however the councils will provide confirmation to the Inspectors examining the JLP as soon possible once the evidence has been updated. The councils are engaging with their SFRA consultants to confirm the timescales for completing these updates. It is possible that the sequential test may also need to be reapplied, depending on the outcome of the updates.
- 3.6. The parties agree to continue to engage with each other effectively and on an on-going basis in updating and maintaining the SFRA for use in plan-making and decision-taking.

JLP Site Allocations and Flood Risk

- 3.7. The EA, both at the Regulation 19 pre-submission publication stage and through subsequent engagement, has raised a number of soundness concerns and detailed points related to JLP site allocations and flood risk. Appendix 1 sets out the EA's comments against each site allocation and the councils' responses, with further responses provided by the EA where appropriate. Matters of agreement are highlighted. The parties agree that there are no outstanding soundness concerns related to JLP site allocations and flood risk.

Policy CE6 - Flood Risk

- 3.8. JLP Policy CE6 - Flood Risk provides an overarching framework for considering flood risk in the districts. The EA, both at the Regulation 19 pre-submission publication stage and through subsequent engagement, has raised the following points in relation to the soundness of Policy CE6:
- a) it is unclear whether brownfield sites are considered part of the functional floodplain; and
 - b) if brownfield sites are considered to be within the functional floodplain, then Policy CE6 part 5 which allows the redevelopment brownfield land in Flood Zone 3b is unsound it could result in vulnerable development within the functional floodplain which is contrary to national planning policy.
- 3.9. Level 1 SFRA Addendum Appendix A (Functional Floodplain Delineation Methodology) confirms at Section 4.6 that buildings and infrastructure within the functional floodplain have been retained within the Flood Zone 3b outline.
- 3.10. To help ensure that there is no increase in vulnerable development within the functional floodplain, the councils will propose the following modification to Policy CE6 point (5) through the JLP examination process:

“Planning permission will not be granted for development in the functional flood plain (Flood Zone 3b) except where it is for water-compatible uses or essential infrastructure (as defined in national planning policy and guidance) or where it is on brownfield land where there is no intensification of use or increase in vulnerability classification and includes a high standard of flood resistance and resilience measures designed to decrease risk compared with the existing situation. All of the following criteria must also be met...”

- 3.11. The EA agrees that this modification would resolve its soundness concerns related to Policy CE6.
- 3.12. At the Regulation 19 stage the EA made a number of other comments about Policy CE6. However, the parties agree that those comments do not relate to matters of soundness.

Oxford Flood Alleviation Scheme

- 3.13. The Oxford Flood Alleviation Scheme aims to provide a long-term solution to flooding in Oxford. Land identified for the scheme falls within both Vale of White Horse and Oxford City. The project is being led by the EA in partnership with a number of other organisations, including Vale of White Horse District Council.
- 3.14. At the Regulation 19 pre-submission publication stage the EA stated that the JLP is unsound as it does not safeguard land for the Oxford Flood Alleviation Scheme. This is a matter of disagreement between the parties.
- 3.15. The EA's position is that this is contrary to NPPF (December 2023) paragraph 167(b) which requires development plans to safeguard land *“that is required, or likely to be required, for current or future flood management”*. The EA states that the JLP should include a clear standalone policy that safeguards land for the Oxford Flood Alleviation

Scheme, both before the scheme is built and once the scheme is constructed and operational, to conserve its integrity and functionality. Without a policy safeguarding land required for the Oxford Flood Alleviation Scheme in the Vale of White Horse, the EA considers the JLP to be unsound.

- 3.16. The councils' position is that this is not a matter affecting the soundness of the JLP. The councils consider the majority of the land required for the Oxford Flood Alleviation Scheme within the plan area to be extremely unlikely to be developed for other purposes, given it is predominantly greenfield Flood Zone 3b functional floodplain in the Green Belt. Furthermore, there is a resolution to grant planning permission for the scheme (subject to the signing of a Section 106 Agreement related to biodiversity and habitat management) and a Compulsory Purchase Order has been granted, enabling the land required for the scheme to be obtained, with an aim of commencing construction in late 2026.

4. Water Cycle Study Matters

Water Cycle Study Detailed Report

- 4.1. The councils produced a Water Cycle Study (WCS) Scoping Report which was published at the Regulation 19 stage (examination library references [CEQ18](#) and [CEQ18.1](#)). The councils have now also completed a WCS Detailed Report ([examination library reference LPA46](#)). The councils engaged closely with the EA throughout the production of the WCS Detailed Report - seeking advice and agreement on the scope and methodology and sharing draft outputs with the EA for review.

Water Resources and Water Supply Infrastructure

- 4.2. At the Regulation 19 pre-submission publication stage the EA raised concerns related to water resources and water supply infrastructure under Policy CE7 - Water efficiency.
- 4.3. The parties agree that the concerns raised related to the need for further assessment of water resources and water supply infrastructure through the WCS Detailed Report, rather than concerns with Policy CE7 itself.
- 4.4. The councils have engaged closely with the EA to produce a WCS Detailed Report that addresses the EA's concerns related to water resources and water supply infrastructure. Importantly, the WCS Detailed Report demonstrates that the quantum and pace of development proposed by the JLP is accounted for within Thames Water Utilities Limited's Water Resource Management Plan 2024. It is also noted that JLP Policy IN: Infrastructure and Service Provision seek to ensure that development and infrastructure delivery is aligned, including water supply infrastructure.
- 4.5. The EA agrees that soundness concerns related to water resources and water supply infrastructure raised at the Regulation 19 pre-submission publication stage have been resolved.

Wastewater Infrastructure and Water Quality

- 4.6. At the Regulation 19 pre-submission publication stage the EA raised concerns about the capacity of a number of sewage treatment works expected to serve development and the possible implications for the water environment. The WCS Detailed Report

considers these issues in detail and identifies the need for upgrades at a number of sewage treatment works.

- 4.7. The JLP has strong policies to ensure that infrastructure upgrades are aligned with planned development, specifically Policy CE8: Water quality, wastewater infrastructure and drainage and Policy IN1: Infrastructure and Service Provision. Policy CE8(8) states:

“Where wastewater infrastructure capacity constraints are identified, development must not commence until the delivery of sufficient new and/or upgraded wastewater infrastructure has been agreed and programmed (between the developer and Thames Water or other utility provider). Development must not be occupied until the necessary wastewater treatment infrastructure upgrades have been completed. A phased approach may be required to ensure alignment between development and infrastructure delivery. The council will apply Grampian conditions, where appropriate, to ensure that adequate sewerage capacity is in place before new homes are occupied in order to protect water quality.”

- 4.8. The councils have engaged with Thames Water Utilities Limited (the sewerage undertaker serving the districts) in producing the WCS Detailed Report and the Infrastructure Delivery Plan (IDP) ([examination library reference SCSD05.1](#)). There has also been wider engagement between the councils and Thames Water Utilities Limited throughout the plan-making process. Engagement between the councils and Thames Water Utilities Limited is summarised in a signed SoCG ([examination library reference LPA22](#)), with paragraph 8.1 stating:

“Both parties agree that they have engaged actively on assessing the water and wastewater infrastructure needs of the residential-led site allocations in the plan. This is achieved through both the IDP and Water Cycle Study (WCS). The parties agree that Thames Water will need to invest in a number of the Sewage Treatment Works across the plan area, both in the current AMP8 and beyond and consistent with the councils’ housing trajectories and new Environmental Permits.”

- 4.9. Thames Water Utilities Limited’s Regulation 19 representations further confirm that they are aware of capacity concerns at a number of sewage treatment works and that upgrades are planned to accommodate future development. Thames Water Utilities Limited advice that it can take three to five years or more for strategic upgrades to be delivered. As the statutory sewerage undertaker with responsibility for planning, funding and delivering wastewater infrastructure, Thames Water Utilities Limited can confirm the scope and timing of required upgrades.

- 4.10. The EA is concerned about uncertainty around when sewage treatment work upgrades required to support future development will be completed, highlighting that not all schemes are funded or programmed as part of AMP8, meaning that some works will not be completed until AMP9 (2030-2035). The EA also highlight a risk of programmed and funded schemes being delayed. The EA states that this could have implications for the deliverability of JLP site allocations.

4.11. The parties are mindful of National Planning Policy Framework (2023) paragraph 194 which states:

“The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively.”

4.12. The parties are also conscious that under the Water Environment (Water Framework Directive- WFD) Regulations 2017, there is a requirement for water bodies not to deteriorate and to achieve ‘good status’ by 2027. Under Regulation 33, local planning authorities as ‘public bodies’ and the EA as a planning advisor must have regard to these requirements as they are part of River Basin Management Plans. The parties are also aware of NPPF (2023) paragraph 180e which states planning policies and decisions should prevent new development from contributing to unacceptable levels of water pollution. The parties agree that the LPA must consider WFD and Water Quality deterioration when making planning decisions. Although the JLP has a specific policy on this matter (Policy CE8: Water quality, wastewater infrastructure and drainage), the EA are of the opinion that the evidence supporting the JLP highlights risks to WFD and water quality deterioration. This may make the Policy CE8 undeliverable.

4.13. The EA do not consider that matters relating to wastewater treatment performance and permit compliance fall primarily within the remit of the regulatory environmental permitting regime, and that planning should proceed on the basis that this regime will operate effectively, due to the impact this would have on the water environment. The EA have concluded that paragraph 194 of the 2023 NPPF, does not state that emissions or pollution arising from a use of land are not material considerations in the determination of planning applications. The EA highlight that they often will be and the weight that can be given to them will be affected by the extent to which the emissions or pollution can (and will) be controlled by other regulatory regimes.

4.14. The EA has concerns about immediate issues for proposed site allocations expected to drain to Didcot, Wantage and Appleton sewage treatment works, where existing capacity issues mean that environmental permits are already being exceeded and there is a risk of water quality deterioration.

4.15. The councils have considered the short-term implications for the JLP and make the following comments:

Appleton Sewage Treatment Works

- One existing site allocation proposed to be carried forward in the JLP would drain to this sewage treatment works (HOU2t South-East of Marcham). This site has full detailed planning consent and is currently building out. Foul water drainage capacity was considered in detail at the planning application stage, including engagement with Thames Water Utilities Limited.
- The WCS Detailed Report notes that proposed JLP site allocation AS10 Land at Dalton Barracks Garden Village could drain to either Appleton or Abingdon sewage treatment works. On a precautionary basis, the impacts of all flows from Dalton Barracks draining to each sewage treatment works was tested. Significant

concerns were raised if flows from Dalton Barracks were to drain to Appleton sewage treatment works. However, engagement with Thames Water Utilities Limited through the plan-making process indicates that it is expected that foul water flows will be directed to Abingdon sewage treatment works instead.

Didcot Sewage Treatment Works

- A number of JLP site allocations and carried forward allocations are expected to drain to Didcot sewage treatment works. It is noted that Thames Water Utilities Limited's Regulation 19 representations state: *"A update is planned for Didcot sewage treatment works. This will improve its ability to treat the volumes of incoming sewage, reducing the need for untreated discharges in wet weather. The scheme is due to complete in 2028."* The EA state that this improvement scheme will not overcome the capacity constraints highlighted in the WCS, that Didcot Sewage Treatment Works is currently exceeding its Dry Weather Flow capacity and further improvement schemes are required to support short term growth in the JLP.

Wantage Sewage Treatment Works

- There are three existing site allocations proposed to be carried forward in the JLP that would drain to this sewage treatment works. HOU2p Monks Farm, HOU2q Grove Airfield and HOU2u Crab Hill. All three sites have outline planning consent with some phases having detailed consent and delivering homes. Appropriate consideration of foul water drainage capacity would have taken place at the planning application stage, including appropriate engagement with Thames Water Utilities Limited.
- The councils have proposed a modification to remove site HOU2w North of East Hanney from the JLP ([examination library reference CSD01.1](#), reference MM07).
- Proposed JLP site allocation AS8 North West of Grove would also drain to Wantage sewage treatment works. It is noted that Thames Water Utilities Limited's Regulation 19 representations state that they do not envisage concerns in relation to the capacity of Wantage sewage treatment works to accommodate additional flows from AS8 North West of Grove.

4.16. The parties recognise that the WCS Detailed Report also identifies the need for upgrades to other sewage treatment works in the medium to long term to serve development proposed in the JLP, particularly at Abingdon and Culham.

4.17. The parties agree to continue to engage with each other and with Thames Water Utilities Limited, to ensure the alignment of development and infrastructure delivery and the protection of the water environment as site allocations come forward.

5. Other JLP Policies

- 5.1. The councils welcome the EA's support on a number of JLP policies, including:

Policy CE7 - Water efficiency

- 5.2. The EA supports the JLP's approach to water efficiency in Policy CE7, including the proposed water efficiency standard for new dwellings of 100 litres per person per day, stating that this is both ambitious and justified.

Policy HP10 – Watercourses

- 5.3. The EA supports Policy HP10 and considers it sound.
- 5.4. At the Regulation 19 pre-submission publication stage the EA suggested three modifications to further strengthen Policy HP10. The parties agree that these modifications do not relate to matters of soundness. Therefore, the councils do not consider these modifications to be necessary.

Policy NH2 - Nature recovery

- 5.5. The EA supports Policy NH2, specifically the requirement for development to deliver at least 20% biodiversity net gain (BNG), and considers it sound.
- 5.6. At the Regulation 19 pre-submission publication stage the EA suggested a modification to either Policy NH2 or its supporting text. The parties agree that this modification does not relate to a matter of soundness. Therefore, the councils do not consider this modification to be necessary.

Policy IN1 - Infrastructure and service provision

- 5.7. The EA supports Policy IN1, and its supporting text, and considers it to be sound.

Policy IN7 - South East Strategic Reservoir Option (SESRO) safeguarding

- 5.8. The EA supports Policy IN7 and considers it sound.
- 5.9. At the Regulation 19 pre-submission publication stage the EA suggested some modifications to Policy IN7. The parties agree that these modifications do not relate to matters of soundness. Therefore, the councils do not consider the proposed modifications to be necessary.

6. Governance agreements

- 6.1. This SoCG will be reviewed and updated as required to reflect the most up-to-date position in terms of joint working.

7. Signatures

Signed:



Tim Oruye

Director of Policy and Programmes

South Oxfordshire District Council and Vale of White Horse District Council

Signed:



Judith Montford

Planning Specialist, Sustainable Places Team, Thames Area
Environment Agency

Appendix 1: EA flood risk comments on Joint Local Plan site allocations

Ref	JLP Stage	EA Comment	Councils' Response	EA Response	Agreement or Disagreement
AS1 - Land at Berinsfield Garden Village					
AS1.1	EA Reg 19 submission (Nov 2024) & EA review of SFRA update (Sept 2025)	The policy states that there shall be “ <i>no development within Flood Zones 2 and 3, other than essential and green infrastructure</i> ”. This wording alone is not sound as it is not justified or in accordance with national policy. (Revised wording suggested.)	We will propose the following modification to Policy AS1 part 2(n) through the JLP examination process to ensure consistency with national planning policy: <i>“that there is no built development within Flood Zones 2 and 3 or the design flood extent (1% AEP plus an appropriate allowance for climate change), other than essential infrastructure that is demonstrated to have passed the Exception Test (where this is required by national policy) -and green infrastructure that has been demonstrated to not increase flood risk elsewhere.”</i> The EA suggested further additions to Policy AS1 part 2(n) related to site-specific flood risk assessments. However, requirements for site-specific flood risk assessments are set out in Policy CE6 and it is not necessary to repeat this within individual site allocation policies.	We support the proposed modification, which broadly follows the suggested wording in our Reg 19 response. The omitted wording around site-specific FRAs was: “A site-specific FRA shall be provided which demonstrates the Exception Test is passed, including that safe access and egress will be provided and that the development will not increase flood risk elsewhere”. We agree that this is stated in policy CE6 (5c and 5d) and is not necessary to be repeated here.	Agreement - proposed modification addresses soundness concern
AS1.2	EA Reg 19 submission (Nov 2024) & EA review of SFRA update (Sept 2025)	In order for this allocation to pass the Exception Test there must be a safe route of access and escape from the development, that ideally does not cross over the floodplain. The SFRA Level 2 demonstrates this can be achieved via Fane Drive to the west of the site. Therefore, there is no evidence that essential infrastructure is required in areas at flood risk, and therefore we do not think the inclusion of essential infrastructure in the activities allowed in Flood Zones 2 and 3 is required.	See response to AS1.1 above.	As above, we agree with the proposed modification	Agreement
AS1.3	EA Reg 19 submission (Nov 2024)	We welcome that this site has been assessed in the Level 2 SFRA. The Level 2 SFRA recommends that “ <i>updated present day and climate change modelling... should be used</i> ”, and that “ <i>were this site to be allocated based on current information, the LPA should make it clear that the site cannot be developed until existing and future flood risk... is fully ascertained</i> ”. This recommendation should be included in the Local Plan policy.	The recommendations of the SFRA would be a material consideration in decision making, therefore it is not necessary to repeat all of the SFRA recommendations within the JLP. Furthermore, the SFRA is intended to be kept up to date. Repeating the recommendations of the current SFRA within the JLP risks the policy becoming out of date when the SFRA is next updated.	The policy is clear (subsection n) that development other than essential and green infrastructure should not be within flood zone 2 and 3. On the understanding that recommendations of the latest level 1 and level 2 SFRA are material considerations, and subsection n applies, we have no major concerns.	No outstanding soundness concern
AS1.4	EA Reg 19 submission (Nov 2024) & EA review of SFRA update (Sept 2025)	Potentially ineffective if detailed modelling changes the amount of Flood Zone 2/3 on site. This could mean the development for which the site has been allocated is no longer deliverable.	This is a large site (132ha). It is 95% Flood Zone 1. Fluvial flood risk is focused in the north-eastern and south-western corners. These areas are identified for green infrastructure on the site’s indicative concept plan (JLP Figure 8.1). In the scenario that detailed modelling showed an increase in areas of Flood Zone 2/3, given the site’s size and the location of the risk, it is expected that this could be accommodated through the detailed design process, keeping built development in Flood Zone 1 without affecting the overall deliverability of the site. It is noted that detailed modelling could also show a reduction in the amount of Flood Zone 2/3 within the site boundary.	We have revisited the Level 2 SFRA for this site. We agree that the site is largely in Flood Zone 1. The Level 2 SFRA states that approximately 85% of the site will be developed. The site topography also suggests that the majority of the site is elevated significantly higher than the land currently shown in Flood Zones 2/3. Therefore, we consider there is no reason to believe the development is undeliverable. This is subject to detailed modelling of the River Thames and the unnamed drain on site, which is a recommendation of the SFRA.	Agreement
AS1.5	EA Reg 19 submission (Nov 2024)	We also have concerns with the evidence base for this site, as the flood risk information used (JFLOW modelling) is not fit to inform a Level 2 SFRA or Local Plan.	We have updated our SFRA following the publication of the EA’s new National Flood Risk Assessment (NaFRA2). In NaFRA2, where detailed local flood models were unavailable (as is the case for this site), the EA’s New National Model has been used to model flood zones. The methodology is more broadscale and not as detailed as that for local models. However, we consider the risk to the overall deliverability of this site to be minimal for the reasons set out above (ref AS1.4).	As above, we have no reason to believe the development is undeliverable.	Agreement

Ref	JLP Stage	EA Comment	Councils' Response	EA Response	Agreement or Disagreement
AS2 - Land adjacent to Culham Campus					
AS2.1	EA Reg 19 submission (Nov 2024) & EA review of SFRA update (Sept 2025)	The policy states that there shall be “no development within Flood Zones 2 and 3, other than essential and green infrastructure”. This wording alone is not sound as it is not justified or in accordance with national policy. (Revised wording suggested.)	<p>We will propose the following modification to Policy AS2 part 2(p) through the JLP examination process to ensure consistency with national planning policy: <i>“ a layout that has land remaining undeveloped to the northern border of the site, that should be utilised for floodplain storage, protecting the physical boundary features on the site; and a layout where there is no built development within Flood Zones 2 and 3 or the design flood extent (1% AEP plus an appropriate allowance for climate change), other than essential infrastructure that is demonstrated to have passed the Exception Test (where this is required by national policy) and green infrastructure that has been demonstrated to not increase flood risk elsewhere;”.</i></p> <p>The EA suggested further additions to Policy AS2 part 2(p) related to site-specific flood risk assessments. However, requirements for site-specific flood risk assessments are set out in Policy CE6 and it is not necessary to repeat this within individual site allocation policies.</p>	We support the proposed modification, which broadly follows the suggested wording in our Reg 19 response. The omitted wording around site-specific FRAs was: “A site-specific FRA shall be provided which demonstrates the Exception Test is passed, including that safe access and egress will be provided and that the development will not increase flood risk elsewhere”. We agree that this is stated in policy CE6 (5c and 5d) and is not necessary to be repeated here.	Agreement - proposed modification addresses soundness concern
AS2.2	EA Reg 19 submission (Nov 2024)	The Level 2 SFRA recommends that “updated present day and climate change modelling... should be used”, and that “were this site to be allocated based on current information, the LPA should make it clear that the site cannot be developed until existing and future flood risk... is fully ascertained”. This recommendation should be included in the Local Plan policy.	<p>The recommendations of the SFRA would be a material consideration in decision making, therefore it is not necessary to repeat all of the SFRA recommendations within the JLP.</p> <p>Furthermore, the SFRA is intended to be kept up to date. Repeating the recommendations of the current SFRA within the JLP risks the policy becoming out of date when the SFRA is next updated.</p>	As above, we agree with the proposed modification.	Agreement
AS2.3	EA Reg 19 submission (Nov 2024) & EA review of SFRA update (Sept 2025)	Potentially ineffective if detailed modelling changes the amount of Flood Zone 2/3 on site. This could mean the development for which the site has been allocated is no longer deliverable.	<p>This is a large site (217ha). It is 87.3% Flood Zone 1. Fluvial flood risk is focused to the north, with small areas in the south-east. The large area of functional floodplain in the north of the site is protected for floodplain storage by Policy AS2 part 2(p) and the site’s indicative concept plan (JLP Figure 8.1) shows a buffer of green infrastructure between the floodplain and development.</p> <p>In the scenario that detailed modelling showed an increase in areas of Flood Zone 2/3, given the site’s size and the location of the risk, it is expected that this could be accommodated through the detailed design process, keeping built development in Flood Zone 1 without affecting the overall deliverability of the site.</p> <p>It is noted that detailed modelling could also show a reduction in the amount of Flood Zone 2/3 within the site boundary.</p>	We have revisited the Level 2 SFRA for this site. We agree that the site is largely in Flood Zone 1. The Level 2 SFRA states that approximately 85% of the site will be developed. The site topography suggests that the rest of the site is elevated higher than the land currently shown in Flood Zones 2/3, which we welcome is safeguarded for floodplain storage. Therefore, we consider there is no reason to believe the development is undeliverable.	Agreement
AS2.4	EA Reg 19 submission (Nov 2024)	This site is affected by unmodelled water channels that are not represented in the Flood Map for Planning. This does not mean there is not potential flood risk from these watercourses. It is important that these watercourses are considered, and modelled where required, to ascertain flood risk to nearby sites. This is a recommendation of the Level 1 SFRA.	<p>The recommendations of the SFRA would be a material consideration in decision making.</p> <p>It is noted that elsewhere the EA has stated that unmodelled ordinary watercourses are not a soundness concern.</p>	We agree that unmodelled OWCs are not a soundness concern, which we have previously confirmed.	Agreement
AS2.5	EA review of SFRA update (Sept 2025)	Not satisfied that the Exception Test has been passed. There is no evidence that essential infrastructure is required in the functional floodplain, therefore we do not think the inclusion of essential infrastructure in the activities allowed in Flood Zones 2 and 3 is required.	See response to AS2.1 above.	See response to AS2.1. We are satisfied that this is addressed by proposed wording.	Agreement

Ref	JLP Stage	EA Comment	Councils' Response	EA Response	Agreement or Disagreement
AS3 - Land South of Grenoble Road, Edge of Oxford					
AS3.1	EA Reg 19 submission (Nov 2024) & EA review of SFRA update (Sept 2025)	The policy states that there shall be <i>"no development within Flood Zones 2 and 3, other than essential and green infrastructure"</i> . This wording alone is not sound as it is not justified or in accordance with national policy. (Revised wording suggested.)	We will propose the following modification to Policy AS3 part 2(k) through the JLP examination process to ensure consistency with national planning policy: <i>"that there is no built development in Flood Zones 2 and 3 or the design flood extent (1% AEP plus an appropriate allowance for climate change), other than essential infrastructure that is demonstrated to have passed the Exception Test (where this is required by national policy) -and green infrastructure that has been demonstrated to not increase flood risk elsewhere."</i> The EA suggested further additions to Policy AS3 part 2(k) related to site-specific flood risk assessments. However, requirements for site-specific flood risk assessments are set out in Policy CE6 and it is not necessary to repeat this within individual site allocation policies.	We support the proposed modification, which broadly follows the suggested wording in our Reg 19 response. The omitted wording around site-specific FRAs was: "A site-specific FRA shall be provided which demonstrates the Exception Test is passed, including that safe access and egress will be provided and that the development will not increase flood risk elsewhere". We agree that this is stated in policy CE6 (5c and 5d) and is not necessary to be repeated here.	Agreement - proposed modification addresses soundness concern
AS3.2	EA Reg 19 submission (Nov 2024)	The Level 2 SFRA recommends that <i>"updated present day and climate change modelling... should be used"</i> , and that <i>"were this site to be allocated based on current information, the LPA should make it clear that the site cannot be developed until existing and future flood risk... is fully ascertained"</i> . This recommendation should be included in the Local Plan policy.	The recommendations of the SFRA would be a material consideration in decision making, therefore it is not necessary to repeat all of the SFRA recommendations within the JLP. Furthermore, the SFRA is intended to be kept up to date. Repeating the recommendations of the current SFRA within the JLP risks the policy becoming out of date when the SFRA is next updated.	The policy is clear (subsection k) that development other than essential and green infrastructure should not be within flood zone 2 and 3. On the understanding that recommendations of the latest level 1 and level 2 SFRA are material considerations, and subsection k applies, we have no major concerns.	No outstanding soundness concern
AS3.3	EA Reg 19 submission (Nov 2024) & EA review of SFRA update (Sept 2025)	Potentially ineffective if detailed modelling changes amount of Flood Zone 2/3 on site. This could mean the development for which the site has been allocated is no longer deliverable.	This is a large site (136ha). It is 95% Flood Zone 1. Fluvial flood risk is focused through the north and centre of the site. These areas are identified for green infrastructure on the site's indicative concept plan (JLP Figure 8.3). In the scenario that detailed modelling showed an increase in areas of Flood Zone 2/3, given the site's size and the location of the risk, it is expected that this could be accommodated through the detailed design process, keeping built development in Flood Zone 1 without affecting the overall deliverability of the site. It is noted that detailed modelling could also show a reduction in the amount of Flood Zone 2/3 within the site boundary.	We have revisited the Level 2 SFRA for this site. We agree that the site is largely in Flood Zone 1. The Level 2 SFRA states that approximately 85% of the site will be developed. We agree that the development could still be accommodated in Flood Zone 1 if detailed modelling increases Flood Zone 2/3 extents. We consider there is no reason to believe the development is undeliverable. This is subject to detailed modelling of the Northfield and Littlemore Brooks, and the drainage ditch on site, which is a recommendation of the SFRA.	Agreement
AS3.4	EA review of SFRA update (Sept 2025)	Not satisfied that the Exception Test has been passed. There is no evidence that essential infrastructure is required in the functional floodplain, therefore we do not think the inclusion of essential infrastructure in the activities allowed in Flood Zones 2 and 3 is required.	See response to AS3.1 above.	See response to AS3.1. We are satisfied that this is addressed by proposed wording	Agreement
AS4 - Land at Northfield, Edge of Oxford					
AS4.1	EA Reg 19 submission (Nov 2024) & EA review of SFRA update (Sept 2025)	The policy states that there shall be <i>"no development within Flood Zones 2 and 3, other than essential and green infrastructure"</i> . This wording alone is not sound as it is not justified or in accordance with national policy. (Revised wording suggested.)	We will propose the following modification to Policy AS4 part 2(k) through the JLP examination process to ensure consistency with national planning policy: <i>"that there is no built development in Flood Zones 2 and 3 or the design flood extent (1% AEP plus an appropriate allowance for climate change), other than essential infrastructure that is demonstrated to have passed the Exception Test (where this is required by national policy) -and green infrastructure that has been demonstrated to not increase flood risk elsewhere."</i> The EA suggested further additions to Policy AS4 part 2(k) related to site-specific flood risk assessments. However, requirements for site-specific flood risk assessments are set out in Policy CE6 and it is not necessary to repeat this within individual site allocation policies.	We support the proposed modification, which broadly follows the suggested wording in our Reg 19 response. The omitted wording around site-specific FRAs was: "A site-specific FRA shall be provided which demonstrates the Exception Test is passed, including that safe access and egress will be provided and that the development will not increase flood risk elsewhere". We agree that this is stated in policy CE6 (5c and 5d) and is not necessary to be repeated here	Agreement - proposed modification addresses soundness concern

Ref	JLP Stage	EA Comment	Councils' Response	EA Response	Agreement or Disagreement
AS4.2	EA Reg 19 submission (Nov 2024)	The Level 2 SFRA recommends that “ <i>updated present day and climate change modelling... should be used</i> ”, and that “ <i>were this site to be allocated based on current information, the LPA should make it clear that the site cannot be developed until existing and future flood risk... is fully ascertained</i> ”. This recommendation should be included in the Local Plan policy.	The recommendations of the SFRA would be a material consideration in decision making, therefore it is not necessary to repeat all of the SFRA recommendations within the JLP. Furthermore, the SFRA is intended to be kept up to date. Repeating the recommendations of the current SFRA within the JLP risks the policy becoming out of date when the SFRA is next updated.	The policy is clear (subsection k) that development other than essential and green infrastructure should not be within flood zone 2 and 3. On the understanding that recommendations of the latest level 1 and level 2 SFRA are material considerations, and subsection k applies, we have no major concerns.	No outstanding soundness concern
AS4.3	EA Reg 19 submission (Nov 2024) & EA review of SFRA update (Sept 2025)	The allocation is not sound. Potentially ineffective if detailed modelling changes amount of Flood Zone 2/3 on site. This could mean the development for which the site has been allocated is no longer deliverable.	This is a large site (68ha) which is 81% Flood Zone 1. Fluvial flood risk is focused along the eastern boundary of the site. This area is identified for green infrastructure on the site's indicative concept plan (JLP Figure 8.3). In the scenario that detailed modelling showed an increase in areas of Flood Zone 2/3, given the site's size and the location of the risk, it is expected that this could be accommodated through the detailed design process, keeping built development in Flood Zone 1 without affecting the overall deliverability of the site. It is noted that detailed modelling could also show a reduction in the amount of Flood Zone 2/3 within the site boundary.	We have revisited the Level 2 SFRA for this site. We agree that the site is largely in Flood Zone 1. The Level 2 SFRA states that approximately 85% of the site will be developed. We consider there is no reason to believe the development is undeliverable. This is subject to detailed modelling of the Northfield and Littlemore Brooks, and the drainage ditches on site, which is a recommendation of the SFRA.	Agreement
AS4.4	EA review of SFRA update (Sept 2025)	Not satisfied that the Exception Test has been passed. There is no evidence that essential infrastructure is required in the functional floodplain, therefore we do not think the inclusion of essential infrastructure in the activities allowed in Flood Zones 2 and 3 is required.	See response to AS4.1 above.	See response to AS4.1. We are satisfied that this is addressed by proposed wording	Agreement
AS5 - Land at Bayswater Brook, Edge of Oxford					
AS5.1	EA Reg 19 submission (Nov 2024)	The policy states that there shall be “ <i>no development within Flood Zones 2 and 3, other than essential and green infrastructure</i> ”. This wording alone is not sound as it is not justified or in accordance with national policy. (Revised wording suggested.)	We will propose the following modification to Policy AS5 part 2(j) through the JLP examination process to ensure consistency with national planning policy: “ <i>provision of built development within Flood Zone 1 only, with areas of Flood Zone 2 and 3 or the design flood extent (1% AEP plus an appropriate allowance for climate change) preserved as accessible green space that has been demonstrated to not increase flood risk elsewhere.</i> ” The EA suggested further additions to Policy AS5 part 2(j) related to site-specific flood risk assessments. However, requirements for site-specific flood risk assessments are set out in Policy CE6 and it is not necessary to repeat this within individual site allocation policies	We support the proposed modification, which broadly follows the suggested wording in our Reg 19 response. The omitted wording around site-specific FRAs was: “A site-specific FRA shall be provided which demonstrates the Exception Test is passed, including that safe access and egress will be provided and that the development will not increase flood risk elsewhere”. We agree that this is stated in policy CE6 (5c and 5d) and is not necessary to be repeated here.	Agreement - proposed modification addresses soundness concern
AS5.2	EA review of SFRA update (Sept 2025)	The allocation is not Sound. Potentially ineffective if detailed modelling changes amount of Flood Zone 2/3 on site. This could mean the development for which the site has been allocated is no longer deliverable.	Planning permission has already been granted for this site. Flood risk was appropriately assessed through the planning application process. A site-specific Flood Risk Assessment was undertaken, which included detailed modelling.	We have reviewed the planning history associated with the site. We confirm that we removed our flood risk objection to this development and included conditions in our letter dated 22 nd May 2025 (ref WA/2023/130356/06-L01).	Agreement
AS5.3	EA review of SFRA update (Sept 2025)	Exception Test is passed.	Agree.	-	Agreement
AS6 - Rich's Sidings and Broadway, Didcot					
AS6.1	EA review of SFRA update (Sept 2025)	The allocation is sound. Unmodelled ordinary watercourse but this is not a soundness concern. Exception Test is not required.	Agree.	-	Agreement
AS7 - Didcot Gateway, Didcot					
AS7.1	EA review of SFRA update (Sept 2025)	The allocation is sound. No flood risk concerns. Exception Test is not required.	Agree.	-	Agreement

Ref	JLP Stage	EA Comment	Councils' Response	EA Response	Agreement or Disagreement
AS8 - North West of Grove, Grove					
AS8.1	EA review of SFRA update (Sept 2025)	The allocation is sound. Unmodelled ordinary watercourse but this is not a soundness concern. Exception Test is not required.	Agree.	-	Agreement
AS9 - North West Valley Park, Didcot					
AS9.1	EA Reg 19 submission (Nov 2024) & EA review of SFRA update (Sept 2025)	The policy states that there shall be " <i>no development within Flood Zones 2 and 3, other than essential and green infrastructure</i> ". This wording alone is not sound as it is not justified or in accordance with national policy. (Revised wording suggested.)	We will propose the following modification to Policy AS9 part 2(p) through the JLP examination process to ensure consistency with national planning policy: <i>"that there is no development within Flood Zones 2 and 3 or the design flood extent (1% AEP plus an appropriate allowance for climate change), other than essential infrastructure that is demonstrated to have passed the Exception Test (where this is required by national policy) and green infrastructure that has been demonstrated to not increase flood risk elsewhere, and that surface water flooding to the north of the site has been investigated and appropriately mitigated."</i> The EA suggested further additions to Policy AS9 part 2(p) related to site-specific flood risk assessments. However, requirements for site-specific flood risk assessments are set out in Policy CE6 and it is not necessary to repeat this within individual site allocation policies.	We support the proposed modification, which broadly follows the suggested wording in our Reg 19 response. The omitted wording around site-specific FRAs was: "A site-specific FRA shall be provided which demonstrates the Exception Test is passed, including that safe access and egress will be provided and that the development will not increase flood risk elsewhere". We agree that this is stated in policy CE6 (5c and 5d) and is not necessary to be repeated here.	Agreement - proposed modification addresses soundness concern
AS9.2	EA Reg 19 submission (Nov 2024) & EA review of SFRA update (Sept 2025)	The allocation is not Sound. Potentially ineffective if detailed modelling changes amount of Flood Zone 2/3 on site. This could mean the development for which the site has been allocated is no longer deliverable.	This is a large site (33ha). It is 88% Flood Zone 1. Fluvial flood risk is focused in the north-eastern corner and along the eastern boundary. These areas are predominantly identified for green infrastructure on the site's indicative concept plan, with some land safeguarded for future highways improvements (JLP Figure 8.9). In the scenario that detailed modelling showed an increase in areas of Flood Zone 2/3, given the site's size and the location of the risk, it is expected that this could be accommodated through the detailed design process, keeping built development in Flood Zone 1 without affecting the overall deliverability of the site. It is noted that detailed modelling could also show a reduction in the amount of Flood Zone 2/3 within the site boundary.	In relation to fluvial flood risk, the policy is clear (subsection p) that development other than essential and green infrastructure should not be within flood zone 2 and 3. On the understanding that recommendations of the latest level 1 and level 2 SFRAs are material considerations, and subsection p applies, we have no major concerns.	No outstanding soundness concern
AS9.3	EA review of SFRA update (Sept 2025)	Not satisfied that the Exception Test has been passed. There is no evidence that essential infrastructure is required in the functional floodplain, therefore we do not think the inclusion of essential infrastructure in the activities allowed in Flood Zones 2 and 3 is required.	See response to AS9.1 above.	See response to AS9.1. We are satisfied that this is addressed by proposed wording.	Agreement
AS10 - Land at Dalton Barracks Garden Village, Shippon					
AS10.1	EA Reg 19 submission (Nov 2024) & EA review of SFRA update (Sept 2025)	The policy states that there shall be " <i>no development within Flood Zones 2 and 3, other than essential and green infrastructure</i> ". This wording alone is not sound as it is not justified or in accordance with national policy. (Revised wording suggested.)	We will propose the following modification to Policy AS10 part 2(e) through the JLP examination process to ensure consistency with national planning policy: <i>"that there is no built development in Flood Zones 2 and 3 or the design flood extent (1% AEP plus an appropriate allowance for climate change), other than essential infrastructure that is demonstrated to have passed the Exception Test (where this is required by national policy) - and green infrastructure that has been demonstrated to not increase flood risk elsewhere."</i> The EA suggested further additions to Policy AS10 part 2(e) related to site-specific flood risk assessments. However, requirements for site-specific flood risk assessments are set out in Policy CE6 and it is not necessary to repeat this within individual site allocation policies.	We support the proposed modification, which broadly follows the suggested wording in our Reg 19 response. The omitted wording around site-specific FRAs was: "A site-specific FRA shall be provided which demonstrates the Exception Test is passed, including that safe access and egress will be provided and that the development will not increase flood risk elsewhere". We agree that this is stated in policy CE6 (5c and 5d) and is not necessary to be repeated here.	Agreement - proposed modification addresses soundness concern

Ref	JLP Stage	EA Comment	Councils' Response	EA Response	Agreement or Disagreement
AS10.2	EA Reg 19 submission (Nov 2024)	The Level 2 SFRA recommends that “ <i>updated present day and climate change modelling... should be used</i> ”, and that “ <i>were this site to be allocated based on current information, the LPA should make it clear that the site cannot be developed until existing and future flood risk... is fully ascertained</i> ”. This recommendation should be included in the Local Plan policy.	The recommendations of the SFRA would be a material consideration in decision making, therefore it is not necessary to repeat all of the SFRA recommendations within the JLP. Furthermore, the SFRA is intended to be kept up to date. Repeating the recommendations of the current SFRA within the JLP risks the policy becoming out of date when the SFRA is next updated.	The policy is clear (subsection e) that development other than essential and green infrastructure should not be within flood zone 2 and 3. On the understanding that recommendations of the latest level 1 and level 2 SFRA are material considerations, and subsection e applies, we have no major concerns.	No outstanding soundness concern
AS10.3	EA Reg 19 submission (Nov 2024)	We also have concerns with the evidence base for this site, as the flood risk information used (JFLOW modelling) is not fit to inform a Level 2 SFRA or Local Plan.	We have updated our SFRA following the publication of the EA’s new National Flood Risk Assessment (NaFRA2). In NaFRA2, where detailed local flood models were unavailable (as is the case for this site), the EA’s New National Model has been used to model flood zones. The methodology is more broadscale and not as detailed as that for local models. However, we consider the risk to the overall deliverability of this site to be minimal for the reasons set out below (ref AS10.4).	See comment for AS10.4 (below).	Agreement
AS10.4	EA Reg 19 submission (Nov 2024) & EA review of SFRA update (Sept 2025)	Potentially ineffective if detailed modelling changes amount of Flood Zone 2/3 on site. This could mean the development for which the site has been allocated is no longer deliverable.	This is a large site (145ha). It is 99.8% Flood Zone 1. Fluvial flood risk is primarily focused along the western boundary. This area is identified for green infrastructure on the site’s indicative concept plan, with a substantial buffer (JLP Figure 8.10). There are also very small areas of Flood Zone 3b along the eastern boundary. In the scenario that detailed modelling showed an increase in areas of Flood Zone 2/3, given the site’s size and the location of risk it is expected that this could be accommodated through the detailed design process, keeping built development in Flood Zone 1 without affecting the overall deliverability of the site. It is noted that detailed modelling could also show a reduction in the amount of Flood Zone 2/3 within the site boundary.	We have revisited the Level 2 SFRA for this site. We agree that the site is largely in Flood Zone 1. The Level 2 SFRA states that approximately 85% of the site will be developed. We consider there is no reason to believe the development is undeliverable. This is subject to detailed modelling of the Sandford Brook, which is a recommendation of the SFRA.	Agreement
AS10.5	EA review of SFRA update (Sept 2025)	Not satisfied that the Exception Test has been passed. There is no evidence that essential infrastructure is required in the functional floodplain, therefore we do not think the inclusion of essential infrastructure in the activities allowed in Flood Zones 2 and 3 is required.	See response to AS10.1 above.	See response to AS10.1. We are satisfied that this is addressed by proposed wording.	Agreement
AS11 - Culham Campus					
AS11.1	EA review of SFRA update (Sept 2025)	The allocation is sound. Unmodelled ordinary watercourse to the north, but this is not a soundness concern. Exception Test is not required.	Agree.	-	Agreement
AS12 - Harwell Campus					
AS12.1	EA review of SFRA update (Sept 2025)	The allocation is sound. No flood risk concerns. Exception Test is not required.	Agree.	-	Agreement
AS13 – Berinsfield Garden Village					
AS13.1	EA Reg 19 submission (Nov 2024) & EA review of SFRA update (Sept 2025)	The policy wording for this site states that there shall be “ <i>no development within Flood Zones 2 and 3, other than essential and green infrastructure</i> ”. This wording alone is not sound as it is not justified or in accordance with national policy.	Policy AS13 sets out the Berinsfield Garden Village principles. EA comments relate to Policy AS1 and are addressed under that policy (ref AS1.1).	Agree, see our comment on AS1.1 above.	Agreement
AS14 – Dalton Barracks Garden Village					
AS14.1	EA Reg 19 submission (Nov 2024)	The policy wording for this site states that there shall be “ <i>no development within Flood Zones 2 and 3, other than essential and green infrastructure</i> ”. This wording alone is not sound as it is not justified or in accordance with national policy.	Policy AS14 sets out the Dalton Barracks Garden Village objectives. EA comments relate to Policy AS10 and are addressed under that policy (ref AS10.1).	Agree, see our comment on AS10.1 above.	Agreement

Ref	JLP Stage	EA Comment	Councils' Response	EA Response	Agreement or Disagreement
AS15 - Harcourt Hill Campus					
AS15.1	EA review of SFRA update (Sept 2025)	The allocation is sound. Unmodelled ordinary watercourse to the south (Seacourt Stream), but this is not a soundness concern. Exception Test is not required.	Agree.	-	Agreement
AS16 - Vauxhall Barracks					
AS16.1	EA review of SFRA update (Sept 2025)	The allocation is sound. No flood risk concerns. Exception Test is not required.	Agree.	-	Agreement
HOU2a - Ladygrove East					
HOU2a.1	EA Reg 19 submission (Nov 2024)	This site has unmodelled channels (OWCs, ditches, drains etc) running through, along or near to the site boundary. These channels are not represented in the Flood Map for Planning. This does not mean there is not potential flood risk from these watercourses. It is important that these watercourses are considered, and modelled where required, to ascertain flood risk to nearby sites. This is a recommendation of the Level 1 SFRA.	<p>Planning permission has already been granted for this site. Flood risk was appropriately assessed through the planning application process.</p> <p>Should a new/revised planning application be submitted, JLP Policy CE6 (Flood Risk) would apply and a site-specific flood risk assessment would be required. This assessment would need to take account of relevant SFRA recommendations, in accordance with JLP paragraph 4.43. Therefore, the JLP provides an appropriate framework for considering flood risk at this site.</p> <p>It is noted that elsewhere the EA has stated that unmodelled ordinary watercourses are not a soundness concern.</p>	<p>As the site already has planning permission, we have no further soundness concerns.</p> <p>We also agree that unmodelled OWCs are not a soundness concern, which we have previously confirmed.</p>	Agreement
HOU2b - Didcot North East					
HOU2b.1	EA Reg 19 submission (Nov 2024)	This site is within FZ2 and 3 from modelled main river (North East Didcot FRA 2014). Other unmodelled OWC/ditch on site. Site carried forward from Policy H2 in the SODC Local Plan 2035. There is nothing in this Local Plan policy regarding flood risk at this site. Therefore, it has not been demonstrated that the proposed development will lie outside of FZ3b or will be developed in accordance with either national policy or Local Plan policy CE6. We question why there is no discussion of flood risk for a site which is clearly at said risk.	<p>Planning permission has already been granted for this site and development has commenced. Flood risk was appropriately assessed through the planning application process.</p> <p>Should a new/revised planning application be submitted, development would need to demonstrate compliance with JLP Policy CE6 (Flood Risk) and relevant national policy.</p>	As the site already has planning permission, we have no further soundness concerns.	Agreement
HOU2c - Land West of Wallingford					
HOU2c.1	EA Reg 19 submission (Nov 2024)	This site has unmodelled channels (OWCs, ditches, drains etc) running through, along or near to the site boundary. These channels are not represented in the Flood Map for Planning. This does not mean there is not potential flood risk from these watercourses. It is important that these watercourses are considered, and modelled where required, to ascertain flood risk to nearby sites. This is a recommendation of the Level 1 SFRA.	<p>Planning permission has already been granted for this site and development has commenced. Flood risk was appropriately assessed through the planning application process.</p> <p>Should a new/revised planning application be submitted, JLP Policy CE6 (Flood Risk) would apply and a site-specific flood risk assessment would be required. This assessment would need to take account of relevant SFRA recommendations, in-line with JLP paragraph 4.43. Therefore, the JLP provides an appropriate framework for considering flood risk at this site.</p> <p>It is noted that elsewhere the EA has stated that unmodelled ordinary watercourses are not a soundness concern.</p>	<p>As the site already has planning permission, we have no further soundness concerns.</p> <p>We also agree that unmodelled OWCs are not a soundness concern, which we have previously confirmed.</p>	Agreement
HOU2d - Land at Wheatley Campus, Oxford Brookes University					
	-	No flood risk comments.	-	-	Agreement
HOU2e - Joyce Grove Nettlebed					
	-	No flood risk comments.	-	-	Agreement
HOU2f - North-East of East Hanney					
	-	No flood risk comments.	-	-	Agreement
HOU2g - South-West of Faringdon					
	-	No flood risk comments.	-	-	Agreement

Ref	JLP Stage	EA Comment	Councils' Response	EA Response	Agreement or Disagreement
HOU2h - Milton Heights					
	-	No flood risk comments.	-	-	Agreement
HOU2i - North-West Radley					
	-	No flood risk comments.	-	-	Agreement
HOU2j - South of Kennington					
	-	No flood risk comments.	-	-	Agreement
HOU2k - North of Shrivenham					
	-	No flood risk comments.	-	-	Agreement
HOU2l - West of Stanford-in-the-Vale					
	-	No flood risk comments.	-	-	Agreement
HOU2m - Land South of Park Road, Faringdon					
	-	No flood risk comments.	-	-	Agreement
HOU2n - North of Abingdon-on-Thames					
HOU2n.1	EA Reg 19 submission (Nov 2024)	This site has unmodelled channels (OWCs, ditches, drains etc) running through, along or near to the site boundary. These channels are not represented in the Flood Map for Planning. This does not mean there is not potential flood risk from these watercourses. It is important that these watercourses are considered, and modelled where required, to ascertain flood risk to nearby sites. This is a recommendation of the Level 1 SFRA.	<p>Planning permission has already been granted for this site and development has commenced. Flood risk was appropriately assessed through the planning application process.</p> <p>Should a new/revised planning application be submitted, JLP Policy CE6 (Flood Risk) would apply and a site-specific flood risk assessment would be required. This assessment would need to take account of relevant SFRA recommendations, in-line with JLP paragraph 4.43. Therefore, the JLP provides an appropriate framework for considering flood risk at this site.</p> <p>It is noted that elsewhere the EA has stated that unmodelled ordinary watercourses are not a soundness concern.</p>	<p>As the site already has planning permission, we have no further soundness concerns.</p> <p>We also agree that unmodelled OWCs are not a soundness concern, which we have previously confirmed.</p>	Agreement
HOU2o - South of Faringdon					
HOU2o.1	EA Reg 19 submission (Nov 2024)	This site has unmodelled channels (OWCs, ditches, drains etc) running through, along or near to the site boundary. These channels are not represented in the Flood Map for Planning. This does not mean there is not potential flood risk from these watercourses. It is important that these watercourses are considered, and modelled where required, to ascertain flood risk to nearby sites. This is a recommendation of the Level 1 SFRA.	<p>Planning permission has already been granted for this site and Parcel 1 is built out. Flood risk was appropriately assessed through the planning application process.</p> <p>Should a new/revised planning application be submitted, JLP Policy CE6 (Flood Risk) would apply and a site-specific flood risk assessment would be required. This assessment would need to take account of relevant SFRA recommendations, in-line with JLP paragraph 4.43. Therefore, the JLP provides an appropriate framework for considering flood risk at this site.</p> <p>It is noted that elsewhere the EA has stated that unmodelled ordinary watercourses are not a soundness concern.</p>	<p>As the site already has planning permission, we have no further soundness concerns.</p> <p>We also agree that unmodelled OWCs are not a soundness concern, which we have previously confirmed.</p>	Agreement
HOU2p - Monks Farm (North Grove)					
	-	No flood risk comments.	-	-	Agreement
HOU2q - Grove Airfield					
	-	No flood risk comments.	-	-	Agreement
HOU2r - Valley Park					
	-	No flood risk comments.	-	-	Agreement
HOU2s - East of Kingston Bagpuize with Southmoor					
	-	No flood risk comments.	-	-	Agreement
HOU2t - South-East of Marcham					
HOU2t.1	EA Reg 19 submission (Nov 2024)	This site has unmodelled channels (OWCs, ditches, drains etc) running through, along or near to the site boundary. These channels are not represented in the Flood Map for Planning. This does not mean there is not potential flood risk	<p>Planning permission has already been granted for this site and development has commenced. Flood risk was appropriately assessed through the planning application process.</p>	<p>As the site already has planning permission, we have no further soundness concerns.</p>	Agreement

Ref	JLP Stage	EA Comment	Councils' Response	EA Response	Agreement or Disagreement
		from these watercourses. It is important that these watercourses are considered, and modelled where required, to ascertain flood risk to nearby sites. This is a recommendation of the Level 1 SFRA.	Should a new/revised planning application be submitted, JLP Policy CE6 (Flood Risk) would apply and a site-specific flood risk assessment would be required. This assessment would need to take account of relevant SFRA recommendations, in-line with JLP paragraph 4.43. Therefore, the JLP provides an appropriate framework for considering flood risk at this site. It is noted that elsewhere the EA has stated that unmodelled ordinary watercourses are not a soundness concern.	We also agree that unmodelled OWCs are not a soundness concern, which we have previously confirmed.	
HOU2u - Crab Hill (North East Wantage and South East Grove)					
	-	No flood risk comments.	-	-	Agreement
HOU2v - North-West of Abingdon-on-Thames					
HOU2v.1	EA Reg 19 submission (Nov 2024)	<p>Possible soundness issue - detailed modelling of allocated sites. We welcome that this site has been assessed in the Level 2 SFRA. The Level 2 SFRA recommends that "updated present day and climate change modelling... should be used", and that "were this site to be based on current information, the LPA should make it clear that the site cannot be developed until existing and future flood risk... is fully ascertained". This recommendation should be included in the Local Plan policy for each of these site allocations.</p> <p>If the policy is not updated to include this recommendation, this presents a soundness concern as the policy could be considered ineffective. For example, if detailed modelling was carried out at an allocated site and the modelled extents were significantly greater than the existing Flood Map for Planning, then the development (and its infrastructure requirements) for which the site has been allocated may no longer be deliverable.</p> <p>We also have concerns with the evidence base for this site, as the flood risk information used (JFLOW modelling) is not fit to inform a Level 2 SFRA or Local Plan. Please refer to soundness concern set out above which suggests that detailed modelling should be undertaken at this site, in accordance with the SFRA. In addition, it has not been demonstrated that the Exception Test can be passed for essential infrastructure in Flood Zone 3b on this site, or that any works can be delivered in the design flood event (which considers the impacts of climate change over the lifetime of the development) without increasing flood risk elsewhere, which is contrary to paragraphs 170 and 173 of the NPPF. In order for this allocation to pass the Exception Test there must be a safe route of access and escape from the development, that ideally does not cross over the floodplain.</p>	This site comprises two parcels of land. The larger parcel to the north-east contains areas of Flood Zone 2 and 3. This parcel has planning permission and is fully built out. The smaller parcel to the south-west has recently been granted planning permission but development has not yet commenced. However, the smaller parcel is entirely within Flood Zone 1. Therefore, there are no outstanding fluvial flood risk concerns to be addressed by the JLP.	As the site already has planning permission, we have no further soundness concerns.	Agreement
HOU2w - North of East Hanney					
	-	No flood risk comments.	-	-	Agreement
HOU2x - Land East of Sutton Courtenay					
HOU2x.1	EA Reg 19 submission (Nov 2024)	This site has unmodelled channels (OWCs, ditches, drains etc) running through, along or near to the site boundary. These channels are not represented in the Flood Map for Planning. This does not mean there is not potential flood risk from these watercourses. It is important that these watercourses are considered, and modelled where required, to ascertain flood risk to nearby sites. This is a recommendation of the Level 1 SFRA.	<p>Planning permissions has already been granted for this site. Flood risk was appropriately assessed through the planning application process.</p> <p>Should a new/revised planning application be submitted, JLP Policy CE6 (Flood Risk) would apply and a site-specific flood risk assessment would be required. This assessment would need to take account of relevant SFRA recommendations, in-line with JLP</p>	<p>As the site already has planning permission, we have no further soundness concerns.</p> <p>We also agree that unmodelled OWCs are not a soundness concern, which we have previously confirmed.</p>	Agreement

Ref	JLP Stage	EA Comment	Councils' Response	EA Response	Agreement or Disagreement
			<p>paragraph 4.43. Therefore, the JLP provides an appropriate framework for considering flood risk at this site.</p> <p>It is noted that elsewhere the EA has stated that unmodelled ordinary watercourses are not a soundness concern.</p>		
JT1a - Southmead Industrial Estate, Didcot					
JT1a.1	EA review of SFRA update (Sept 2025)	The allocation is not sound. Potentially ineffective if detailed modelling changes amount of Flood Zone 2/3 on site. This could mean the development for which the site has been allocated is no longer deliverable.	<p>This is a 2.7ha employment site. It is 96% Flood Zone 1. Fluvial flood risk is focused along the eastern boundary.</p> <p>In the scenario that detailed modelling showed an increase in areas of Flood Zone 2/3, given the location of risk it is expected that this could be accommodated through the detailed design process, keeping built development in Flood Zone 1 without affecting the overall deliverability of the site.</p> <p>It is noted that detailed modelling could also show a reduction in the amount of Flood Zone 2/3 within the site boundary.</p>	We have revisited the Level 2 SFRA for this site. We agree that the site is largely in Flood Zone 1. The Level 2 SFRA states that approximately 85% of the site will be developed. We consider there is no reason to believe the development is undeliverable. This is subject to detailed modelling of the Sandford Brook, which is a recommendation of the SFRA.	Agreement
JT1a.2	EA review of SFRA update (Sept 2025)	Not satisfied that the Exception Test has been passed.	This site is proposed for employment development which is a less vulnerable use. Furthermore, no essential infrastructure is proposed in Flood Zones 3a or 3b. The Level 2 SFRA demonstrates that a safe route of access and escape can be achieved via Collett to the west. Therefore, the Exception Test is not required.	See our response to JT1a.1 above. However, please note that if the amount of FZ3b changes on site then locating essential infrastructure in 3b may be unavoidable. In this scenario, the Exception Test will be required.	Agreement
JT1b - Grove Technology Park					
JT1b.1	EA review of SFRA update (Sept 2025)	The allocation is sound. No flood risk concerns. Exception Test is not required.	Agree.	-	Agreement
JT1c - Land next to Milton Interchange (Enterprise Zone 2)					
JT1c.1	-	No flood risk comments.	-		Agreement
JT1d - Hithercroft Industrial Estate, Wallingford					
JT1d.1	EA review of SFRA update (Sept 2025)	The allocation is sound. No flood risk concerns. Exception Test is not required.	Agree.	-	Agreement
JT1e - Monument Business Park, Chalgrove					
JT1e.1	EA review of SFRA update (Sept 2025)	The allocation is sound. No flood risk concerns. Exception Test is not required.	Agree.	-	Agreement
JT1f - Abingdon Science Park					
JT1f.1	EA review of SFRA update (Sept 2025)	The allocation is not sound. Potentially ineffective if detailed modelling changes amount of Flood zone 2/3 on site. This could mean the development for which the site has been allocated is no longer deliverable.	This is an existing employment site with a total site area of 16.7ha. Only 0.7ha remains to be delivered through the JLP allocation. Planning permission has already been granted. Flood risk was appropriately assessed through the planning application process.	As the site already has planning permission, we have no further soundness concerns.	Agreement
JT1f.2	EA review of SFRA update (Sept 2025)	Not satisfied that the Exception Test has been passed.	<p>Planning permission has already been granted for the 0.7ha remaining to be delivered. Flood risk was appropriately assessed through the planning application process.</p> <p>Furthermore, the JLP allocation is for employment development, which is a less vulnerable use. In addition, no essential infrastructure is proposed in Flood Zones 3a or 3b. The site-specific Flood Risk Assessment associated with the planning permission for this site demonstrates a safe access and escape route via the existing car park access onto Barton Lane. Therefore, the Exception Test is not required.</p>	See above, site already has planning permission.	Agreement

Ref	JLP Stage	EA Comment	Councils' Response	EA Response	Agreement or Disagreement
JT1g – Didcot A					
JT1g.1	EA Reg 19 submission (Nov 2024)	This site has unmodelled channels (OWCs, ditches, drains etc) running through, along or near to the site boundary. These channels are not represented in the Flood Map for Planning. This does not mean there is not potential flood risk from these watercourses. It is important that these watercourses are considered, and modelled where required, to ascertain flood risk to nearby sites. This is a recommendation of the Level 1 SFRA.	The recommendations of the SFRA would be a material consideration in decision making. It is noted that elsewhere the EA has stated that unmodelled ordinary watercourses are not a soundness concern.	On the understanding that the recommendations of the latest L1 and L2 SFRAs are material considerations, then we have no major concerns We agree that unmodelled OWCs are not a soundness concern, which we have previously confirmed.	No outstanding soundness concern
JT1h – Didcot Quarter (Enterprise Zone 2)					
JT1h.1	-	No flood risk comments.	-	-	Agreement
JT1i - Former Esso Research Centre					
JT1i.1	EA review of SFRA update (Sept 2025)	The allocation is sound. No flood risk concerns. Exception Test is not required.	Agree.	-	Agreement
JT1k - South of Park Road, Faringdon					
JT1k.1	EA review of SFRA update (Sept 2025)	The allocation is sound. No flood risk concerns. Exception Test is not required.	Agree.	-	Agreement
JT1l - Didcot Technology Park					
JT1l.1	-	No flood risk comments.	-	-	Agreement
JT1m – Milton Park					
JT1m.1	-	No flood risk comments.	-	-	Agreement