

Q24 In looking at Appendix F to key document KD5 (the list of all issues raised at Regulation 19(1) stage and officer responses), I note the section on Site Allocations (page 244-249 of Appendix F) which falls between the comments on Policy P12 and those on Policy D1. The introduction to Appendix F advises that it has been ordered in accordance with the Regulation 19(1) version of the Plan which implies that the comments relate to a section of the plan between Policy P12 and D1. But, in the submitted (Regulation 19(2) Plan) there is no content between Policy P12 and Policy D1. Yet the commentary on the Regulation 19(1) representations does not suggest that there has been any conscious decision to omit a section of the document. So, I am puzzled and seek an explanation.

In my earlier questions I raised the issue of the status of the figures in the plan and the Policies Map. None of the figures within the submitted plan appear to identify allocations as such, although such may be inferred from the information they contain. Allocations are shown on the policies map but without any reference number by which they can be identified and with no indication of what they are allocated for. Although I have not yet explored all the submitted documentation, there does not appear to be any separate schedule of allocations.

In the apparent absence of an allocations schedule, I am not entirely clear how, other than by the table 11.1, the submitted plan is intended to fulfil the expectations of paragraph 154 of NPPF (2012); "Local Plans should set out the opportunities for development" and of paragraph 157 bullet 5; "allocate sites to promote development and flexible use of land.... and provide detail on form, scale, access and quantum of development where appropriate."

Q25. I note the OPDC response to representation EU3/14 made in response to the Regulation 19(1) consultation; "Achieving greenfield runoff rates is imperative as the sewer network is at capacity and the statutory undertaker has indicated they cannot provide any more capacity. As additional sewage will be generated through the development, rain water will have to be diverted from sewers and treated on site to compensate for the additional flow of sewage."

Presumably, in some cases, the quantity of sewage flow generated by an intense development could be greater than the rainwater flow thus diverted and so, to accommodate the sewage flow, rainwater flow from additional existing development would also need to be diverted to SUDS in order to provide the capacity. Can the OPDC point me to the parts of the evidence base where this has been considered and, if the evidence confirms that this would be required, explain to me the process by which it would be achieved.

Paul Clark  
Inspector