

Bioregional's response to 'Proposed Himley Village, North West Bicester, Middleton Stoney Road, Bicester, Oxfordshire (no: 14/02121/OUT)

1. Introduction

Thank you for consulting Bioregional on this application. Bioregional are an environmental charity who work with partners around the world to champion a better and more sustainable way to live. We have been involved in NW Bicester development plans since 2010, advising both Cherwell DC and A2Dominion on eco-credentials and sustainability.

This report outlines Bioregional's key observations on the Himley Village outline application (14/02121/OUT). We have reviewed the application documents against the overall Eco Town aspirations, the PPS1 Supplement on Eco Towns and the Bicester One Shared Vision.

Bioregional have been fully committed to the Eco Town process throughout its development and will continue to work with all partners to help it deliver its full potential.

2. Summary

In summary, there is not enough information provided in the application to support it, particularly around Green Infrastructure, biodiversity and the energy strategy.

3. Overall eco-credentials and general comments

We are pleased to see the incorporation of the following points within this application:

- Overarching awareness and commitment to the Eco towns PPS principles
- Commitment to 'True Zero Carbon target' as defined by the ET PPS
- All homes to achieve Code 5 of the Code for Sustainable Homes
- Employment areas to achieve BREEAM Excellent
- Connection to site-wide district heating network and an understanding of the future potential to connect to Ardley ERF Facility
- Inclusion of sustainable transport solutions such as electric vehicle charging points, car club and employment of a travel plan coordinator
- Details of a proposed community governance model to establish a Community Land Trust (referred to as the Himley Farm Land Trust) to take on the long-term operation of the landscape and community assets.
- Significant work and detail on creating a 'productive landscape' and encouraging local food growing

4. Energy

a. Baseline Energy Demand

Information is needed to explain the energy baseline within the Sustainability and Energy Statement. The baseline electrical demand appears to be too low and the baseline heat demand appears to be quite high.

The energy statement suggests an 8% electricity reduction for 'lean' improvements from the baseline. Depending on the baseline assumptions, we feel that this would be hard to achieve. We request further details to understand how this improvement is to be met.

We also query what the predicted electrical demands are based on and the assumptions used for the low energy lighting and white goods.

With regards to heat, the predicted heat demand provided is significantly higher than the standard on the Exemplar Phase. We are concerned that this may not comply with the FEES level set by Code 5 of the Code for Sustainable Homes. We would appreciate further information on these predicted demands and the actual FEES level that is being targeted.

b. Zero Carbon

We are concerned that the energy generation solution seems oversized for the total heat demand. Is the proposed solution sized this way to meet heat demands from other parts of the masterplan?

Alternatively, the oversizing of the heat solution could indicate large distribution losses, very low efficiencies from the biomass and gas plants or simply too much heat in the system, which would need to be 'dumped'. We would appreciate seeing more details to address these queries and a breakdown of the heat provided from the biomass boiler and gas back-up boiler to meet the remaining demand.

From the energy statement, it is unclear what the proposed energy solution is for homes 401-999. We would appreciate seeing more information on the timing and phasing of zero carbon for this phase and for the entirety of the development. We would expect zero carbon to be achieved before the 200th home is built and on an ongoing basis.

We would also expect to see further details on the indicative roof areas for the installation of PV to ensure there is sufficient area around the edge of the roofs.

5. Transport

a. Modal shift targets

The modal shift ambitions within the transport assessment do not currently meet the PPS requirements. The PPS looks for a 50% modal shift, with potential to rise to 60% over time, and significantly more ambitious targets as NW Bicester is close to a higher order settlement (ET11.3 (b)).

We would welcome further work on how a modal shift of 60% could be achieved within this proposal; this could be through the providing different scenarios and precedents studies.

b. Off-site connectivity

The transport assessment lists the key external connections between Himley Village and the existing town. It then breaks these down into primary and secondary connections.

Although it states that these connections will be investigated with Oxfordshire County Council and could be delivered through S106 agreements, we would welcome more details on the timescale for the enhancements and which ones will be taken forward. (PPS; ET 11 Transport - *The town should be designed so that access to it and through it gives priority to options such as walking, cycling, public transport and other sustainable options, thereby reducing residents' reliance on private cars*”).

c. Cycle and Car Parking

We welcome the lower than standard allocated parking numbers, however, we do have some concerns that this could lead to a car-dominated public realm. We would like to see further detail on how un-allocated parking (on-street parking) would be managed.

It is encouraging to see the commitment to cycle storage (in line with the Code for Sustainable Homes); however, we suggest that cycle storage should be moved to the front of all properties. This would increase the convenience for residents.

6. Urban Design

We welcome the landscape led approach to the arrangement of the homes. The indicative masterplan suggests that homes will be backing on to green routes and the back of dwellings will be fronting onto the public realm. We have some concerns over the safety and security of these green routes and would appreciate more information on how this arrangement can lead to a safe and attractive built environment.

The DaS does include information on character areas and separates the proposals in to five key areas. We would welcome future detailed designs and design codes to provide information on the character and identity of buildings.

a. Listed Building

At the centre of the proposal is Himley Farm. This is Grade II listed and sits within arable fields. The application will clearly have an impact upon its setting, as it will no longer be within rural surroundings. The proposal does include a buffer around the whole site, however we would expect at detailed design stage that proposals would look to mitigate the impact on the listed building as much as possible (in line with Para 129 NPPF) by considering the detailing and scale of dwellings closest to Himley Farm.

7. Landscape and Green Infrastructure

The Design and Access statement refers to a commitment to achieve 40% GI across the development area (as defined by PPS ET14); however, the application does not include a land use schedule that would confirm how this is achieved.

a. Allotments

We are pleased to see the provision of allotments and 'growing zones' within the application and that the provision is more than the stated Cherwell minimum of 0.31ha per 1000 people. We question whether this could be higher and follow the example of the Exemplar development that used a parameter of 0.5ha per 1000. We encourage this higher figure as there is a substantial waiting list for allotments in Bicester and they form an important part of a sustainable food strategy (ET 14 – Eco Towns PPS highlights that "Particular attention should be given to land to allow the local production of food from community, allotment and/or commercial gardens")

Additionally, it would be beneficial to understand the reasons behind the placement of the allotments, for example are they located in the most suitable areas for access and sunlight.

b. Play space

Similarly, to allotments, play space is a valuable community facility. A clear rationale for the locations of play space should be included in the DaS. Currently the application seems to allocate space but does not clearly explain why they are located there.

8. Biodiversity

a. Net Gain

We welcome reference within the Environmental Statement to the NW Bicester Biodiversity Strategy that was submitted with the Masterplan and with A2Dominion's outline applications.

However, a site-specific biodiversity strategy has not been submitted and there is no reference within the Design and Access Statement to a Biodiversity Net Gain target as required by PPS ET 16 (*"A strategy for conserving and enhancing local biodiversity should be produced to accompany planning applications for eco-towns"*).

We request a Defra metric calculation be done in line with the NW Bicester masterplan.

b. Offset scheme

The application does not include any reference to an offset/compensation scheme for farmland birds. The application should be looking to contribute towards a compensation scheme to compensate for the loss of breeding habitat for farmland bird species such as the yellowhammer as identified within the baseline habitat surveys that support the NW Bicester Masterplan.

Achieving the net biodiversity gain target is dependent upon the successful delivery of a farmland bird offset scheme, some potential areas to focus on include:

- Management of the scheme and ensuring any management company has the correct experience and resources to manage at this scale
- Proximity of the enhanced land uses to NW Bicester
- Levels of payments compared to other comparable schemes
- Safeguarding the enhanced land after the life-time of the scheme to ensure long-term biodiversity gains

c. Hedgerows

There is a commitment on page 109 of the Design and Access Statement that existing hedgerows will be enhanced with a 10m wide buffer. However, we could not find detail of the creation and protection of dark corridors. The NW Bicester Masterplan GI and Landscape Strategy (pages 40 - 41) have detailed commitments regarding dark corridors and the 20m buffer either side of the hedgerow. As part of the NW Bicester Masterplan, we would expect this application to follow these commitments.

Additionally, there is no mention of how the Great Crested Newt Ponds will be protected and enhanced. Great Crested Newts are protected by Schedule 5 of the Wildlife and Countryside Act and therefore require significant safeguarding. The Environmental Statement does state that a Great Crested Newt Mitigation strategy will be created. We would welcome the overarching principles be added to the DaS.

We would welcome the inclusion of a 'hedgerow removal and break' map to understand the amount of hedgerow to be removed and how this will be mitigated. In particular, can these breaks be minimised by narrowing and arches and will hedgerow loss be compensated by translocation or new planting?

Finally, in the absence of a specific Green Infrastructure and Landscape strategy we would like to see the creation of a buffer zone brief that would contain:

- Location of different buffer zones (hedgerow, dark, woodland, newt pond etc...)
- Parameters of each type (width, lighting etc...)
- What can be placed in each of these areas (walking and cycling routes)

9. Water

Policy ET 17.5 of the ET: PPS1 states that areas of serious water stress (such as Bicester) should aspire to achieve water neutrality. The 80l/p/d target for residential and non-residential set out within the Energy and Sustainability Statement is a positive step towards this. However, nothing further is provided within the environmental statement or within the NW Bicester Masterplan Water Cycle Study on how ultimately water neutrality can be achieved on this site but also across the entirety of NW Bicester.

10. Summary

We recommend that the following matters be addressed before outline permission is granted:

1. Justification for the assumed energy demands in the energy strategy
2. Indicative performance specification and efficiency data for the CHP plant, biomass boiler and back up boilers
3. A detailed carbon balance for the overall energy solution and for the final and interim phases
4. Achievement of the biodiversity net gain target through the DEFRA metric
5. A robustly planned offset scheme for farmland bird habitat
6. Options for more ambitious modal shift targets
7. Commitments around the delivery of offsite walking and cycling connections
8. Full land use schedule to understand the mix of green spaces and compliance with the 40% GI standard
9. A discussion around the principles of how green space is used on the front and back of homes
10. More detailed brief for the different buffer zones and location of hedgerow breaks
11. An understanding for the inclusion of commercial uses along Middleton Stoney Road which could threaten the viability of local centres on NW Bicester

In summary, there is not enough information provided in the application to support it, particularly around GI, biodiversity and the energy strategy.