

DEVELOPMENT INTERNAL MEMORANDUM

From: Head of Strategic Planning and the Economy

To: Head of Development Management (FAO Linda Griffiths)

Our Ref: 3.2

Your Ref: 15/02103/REM

Ask for: Amy Brent

Ext: 1840

Date: 20/01/2016

APPLICATION FOR PLANNING PERMISSION PLANNING POLICY CONSULTATION RESPONSE

Planning Application No.	15/02103/REM
Address / Location	Kingsmere development, South West Bicester. Formerly 2 Whitelands Farm Cottages Street From Middleton Stoney Road To Whitelands Farm Chesterton Bicester OX26 1RS
Proposal	Reserved Matters to application 06/00967/OUT - Provision of Local Centre to include Community Centre (Class D1), Youth Centre (Class D1), Nursery (Class D1), Convenience Store (Class A1), 4 x retail units (Class A1/A2/A3/A4 and/or A5) and associated development including public square, landscaping, car parking, recycling point and ancillary servicing yard
General Comments	<p>The local centre will include local convenience shops, a community hall, a youth centre, and a day nursery. The local centre is proposed to serve both South West Bicester Phase 1, and South West Bicester Phase 2 which is a strategic allocation in the adopted Cherwell Local Plan Part 1 (Policy Bicester 3). In total approximately 2000 of non-residential floorspace is proposed.</p> <p>The following comments focus specifically on the submitted Sustainability Strategy.</p> <p>BREEAM 'Very Good' was applied as a condition on the outline application. The achievement of BREEAM 'Very Good' is a requirement of adopted policy ESD 3 of the Cherwell Local Plan. The Sustainability Strategy proposes an alternative strategy, stating the following reasons as justification:</p> <ul style="list-style-type: none"> - BREEAM certification is inappropriate for the small buildings in the local centre - BREEAM certification is inappropriate at reserved matters stage - Separate BREEAM assessments are required for each type of use, and the total number of individual assessments required would be prohibitively expensive. <p>Consequently, the Sustainability Strategy states that in this particular instance, BREEAM is not viewed as the best mechanism to deliver sustainable buildings. This is considered in the following response.</p>
Main Local Plan Policies	<p>Adopted Cherwell Local Plan 2011-2031</p> <ul style="list-style-type: none"> • Policy ESD 1: Mitigating and Adapting to Climate Change

	<ul style="list-style-type: none"> • Policy ESD 2: Energy Hierarchy and Allowable Solutions • Policy ESD 3: Sustainable Construction • Policy ESD 4: Decentralised Energy Systems • Policy ESD 5: Renewable Energy
<p>Main Policy Observations</p>	<p>The Planning Policy Team’s main observations are:</p> <ul style="list-style-type: none"> • Policy ESD 1 of the adopted Cherwell Local Plan Part 1 requires all developments to reduce carbon emissions and use resources more efficiently, including water. Decentralised and renewable or low carbon energy will be promoted where appropriate. Developments should demonstrate the consideration of climate change adaptation measures including the use of passive solar design for heating and cooling, and reducing the effects of the development on the micro climate (through green infrastructure including planting and green roofs). The Sustainability Strategy does not refer to microclimate adaptation such as green roofs (or green walls); and although it briefly references the need to maximise passive solar gain it does not explain how this is being achieved. Passive cooling should also be considered. • Policy ESD 2 requires an Energy Hierarchy to be applied which includes reducing energy use through sustainable construction, supplying energy efficiently including giving priority to decentralised energy supply, and making use of renewable energy. These are discussed in turn below. • Policy ESD 3 requires the achievement of BREEAM ‘Very Good’ for non-residential developments. It also encourages the demonstration of sustainable construction methods including maximising opportunities for shading and cooling, through the provision of green roofs, for example, which are not covered in the Sustainability Statement. • The Sustainability Strategy states that BREEAM certification is not being achieved for the reasons listed above including based on the small size of individual units of differing uses. BREEAM guidance does advise that separate assessments are carried out for different uses on a mixed use site but the Sustainability Strategy provides no evidence to support the statement relating to “all of the buildings being significantly under 500sqm, which is the threshold typically set for the application of BREEAM”. There is no threshold for the applicability of BREEAM in Policy ESD 3, which is an adopted policy. There is no minimum threshold for the use of BREEAM in the BREEAM methodology. • An alternative strategy to BREEAM ‘Very Good’ is proposed but it is not clear how the two compare because the Sustainability Strategy promotes ‘improvements over 2013 Building Regulations’ in relation to fabric efficiency improvements but does not quantify these improvements. The only quantified improvement in carbon emissions is in relation to renewable energy generation. • The Sustainability Statement’s bar chart “The Carbon Footprint of Kingsmere Local Centre” indicates that the development will be constructed to the efficiency standards required at a national level through the 2013 Building Regulations, and additional carbon savings totalling 2% will be achieved through the use of renewable energy (solar PV). The Sustainability Statement does not explain why only a 2% carbon saving can be achieved and arguably this is not an aspirational target in the context of the One Shared Vision for Bicester (see below). The bar chart does not indicate that any carbon savings are being achieved through fabric efficiency improvements above Building Regulations, despite the bullet points on page 14 (and the conclusions table) highlighting that the requirements of the 2013 Building Regulations will be exceeded wherever possible particularly with regards to air tightness. If the Building Regulations are being exceeded through increased fabric efficiency, what are the resultant carbon savings? Improvements framed against the 2006 and 2010 Building Regulations are

	<p>not relevant as these have been superseded by the 2013 regulations, and the policy requirement is for BREEAM 'Very Good'.</p> <ul style="list-style-type: none"> • The concluding table in the Sustainability Strategy “demonstrates that the performance of the development delivered through the bespoke Sustainability and Energy Strategy detailed in Section 3 will be equivalent or better than that achieved through a BREEAM rating”. However the table does not clearly show how the alternative strategy proposed compares to the BREEAM Very Good rating. • The Sustainability Statement proposes to target a 30% reduction in water consumption; it is not clear how this equates to the water efficiency level that a BREEAM Very Good standard would have achieved. • Policies ESD 4 and ESD 5 of the adopted Cherwell Local Plan require feasibility studies for developments of over 1000sqm for decentralised energy, providing either district heating or combined heating and power (CHP), and renewable energy. The Sustainability Strategy briefly summarises the findings of a feasibility assessment for solar PV, with panels to be used on one part of the local centre. Without seeing the feasibility assessment it is not clear if more could be achieved. It is not clear whether consideration has been given to low carbon energy particularly in the form of micro CHP and the carbon savings that would result. • The eco-town allocation at North West Bicester is to act as a trigger for the transition to a more sustainable community across Bicester as a whole. The Eco Bicester One Shared Vision sets out the vision for creating a low carbon sustainable community across Bicester. One of its aims is to ensure that new buildings at Bicester are designed and built to the highest environmental standards in terms of energy efficiency and sustainable construction techniques, and which include zero or low carbon energy provision as well as reduced water use. Water neutrality across the town is sought. There are clear environmental sustainability aspirations for new development across Bicester in the One Shared Vision document and the Sustainability Strategy could have reflected these aspirations. • The Sustainability Strategy needs to contain more information and clearer commitments to demonstrate that a standard equivalent to (or better than, as stated) BREEAM Very Good will be achieved. Given the wider context including the promotion of Bicester as a whole as an exemplary sustainable community, the Sustainability Strategy is encouraged to make more aspirational commitments relating to a higher level of sustainability and these commitments need to be secured.
<p>Policy Recommendation</p>	<p>Clarification required on the observations identified above.</p>