

Planning and Development

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Your Ref: **22/03763/SCOP**

27th January 2023

Dear Sir/ Madam,

TOWN AND COUNTRY PLANNING ACT 1990

Application No.:	22/03763/SCOP
Applicant's Name:	Oxford University Development Ltd
Proposal:	Scoping Opinion with respect to the scope and methodology of the Environmental Impact Assessment (EIA) in relation to re-development proposals of approximately 170 hectares (Ha) land at the existing Begbroke Science Park and surrounding land. The findings of the EIA will be reported in an Environmental Statement (ES) which will accompany the planning application
Location:	Begbroke Science Park Begbroke Hill Begbroke Kidlington OX5 1PF
Parish(es):	Begbroke, Kidlington and Yarnton

Further to your correspondence dated 9 December 2022 and the submitted EIA Scoping Report, having consulted the relevant colleagues both in Cherwell District Council and Oxfordshire County Council, together with other statutory authorities and consultation bodies. Their responses are set out below, largely in full and in some cases include matters that go beyond the site boundary. This written response constitutes the Council's formal Scoping Opinion.

The request for a Scoping Opinion relates to the re-development proposals of approximately 170 hectares (Ha) land at the existing Begbroke Science Park and surrounding land which form a substantive part of the Development Plan allocation as part of the Cherwell Local Plan 2011 - 2031 (Part1) Partial Review - Oxford's unmet housing need (PR2020) known as PR8, land east of A44.

Site and Setting

The site and setting (set out in the Scoping Report) is broadly agreed.

The addition of references to London Oxford Airport, Campsfield House IRC and the business parks to the south of Langford Lane should be incorporated in the description of surroundings to the north of the site as these are visible from the existing Science Park. Further the description of the landscape to these areas are also important considerations.

OCC Property note that no area of the school sites shall be located in flood zones 2 or 3 which are located towards the east of the site and consideration must be given to this when proposing the school locations.

Network Rail highlights that at Paragraph 2.32 of the document refers to the development of proposals by NR to close two of the three level crossings and mentions the replacement of Yarnton LC with a cycle/pedestrian bridge. Network Rail highlight that this is incorrect - Network Rail are not replacing Yarnton Lane with a cycle bridge.

Description of the Proposed Development

The proposed description within the Scoping Report is broadly agreed however the following elements are noted. The Proposed Development is at an early stage of design and will continue to evolve in response to technical analysis as part of the EIA process and consultation with the public, CDC and other stakeholders.

The proposed development is stated as including a minimum of 1,750 dwellings (within Use Classes C3, C4 and Sui Generis). Other aspects have been discussed including care and retirement living and may be included.

As such, the context of the wider development should also be discussed in terms of the potential for care, retirement accommodation and visitor accommodation to support the Science Park and wider community. Whilst this is outside the detail of Policy PR8, the proposals could be concluded to not be unacceptable in principle if delivered in an acceptable manner.

It is noted that the Scoping Report updates the adopted planning policy in respect of the updated Use Classes Order introduced in August 2021 and introduces Class E, F.1 and F.2. It would also be beneficial to include matters of commercial development (e.g. public houses) which fall within Sui Generis activity.

In respect of the Illustrative Masterplan shown at figure 3.1, the proposed detail of this masterplan will need to reflect detailed discussions as to the layout and position of infrastructure, for example, the schools. The location of many aspects have not been agreed or supported with detailed assessment. At this time the masterplan does not show the position of all the schools and the position of the secondary school, could be unacceptable.

Further guidance can be found in the Design Criteria for Primary and Secondary Schools and these should be agreed prior to the application submission.

Building height parameters are still being defined, but are expected to range between two and four storeys. In suitable locations, the Proposed Development may reach heights of up to circa five/six storeys subject to further technical analysis and review.

Embedded mitigation measures will be incorporated and designed into the Proposed Development to address the potential effects on the surrounding land uses. Workshops are currently being undertaken as part of the EIA process to ensure that embedded mitigation measures are incorporated into the design.

The existing network of PRoWs will be retained where possible and incorporated into the Proposed Development (with some potential diversions to negotiate the new features on-site) maintaining connectivity across the Site. New footpath and cycleway links will be introduced to enhance the connectivity within the wider area and provide an enhanced active travel resource to the local communities.

Landscaping and ecological enhancement will be implemented to achieve a minimum of 10% biodiversity net gain ('BNG') on-site, in-line with policy requirements, with a target to achieve 20% BNG. This will include the restoration of habitat connectivity within the landscape proposals by linking

habitats which are currently isolated, particularly woodlands, hedgerows and grasslands. The Proposed Development will create new habitats of high ecological value including ponds, species-rich grasslands, woodlands, orchards, native scrub and species-rich hedgerows. A new Local Nature Reserve of circa 30 ha in extent will be created in the north of the Site, along with a nature conservation area (circa 11 ha) and canalside park (circa 20 ha).

The Proposed Development is also likely to include engineering works to achieve proposed site levels. This will involve cut and fill to achieve appropriate levels for the new built development. Excess cut will be used on-site for landscape features.

Phasing

Construction phasing and programme assumptions are uncertain at this stage, although it is expected that the Proposed Development would be built out over a period of approximately 8 years, although this could be subject to change.

Subject to the grant of planning permission, it is anticipated that construction of the Proposed Development could commence in or around 2025, with construction expected to be complete in or around 2033. Construction of the Proposed Development would be phased and therefore some components would be occupied and operational during the construction phase.

Relevant Planning Policy and Guidance

Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

A number of announcements have been made in respect of the Government's proposed Levelling Up and Regeneration Bill which may have implications on the future development. It is noted that the Environment Act is due to receive further ratification in terms of the progress to a formal regime on Biodiversity Net Gain. There is also expectation that the current EIA regime will be subject to change. However these have yet to be fully clarified and the advice given is the best Officer advice that can be given at this time the advice below is prepared in the context of the current policy and guidance.

It is also noted that the Government published a consultation draft of the NPPF on 22 December 2022 which closes in March 2023. There are a number of changes in the draft document which relate to housing supply, the provision of housing to meet neighbouring authorities need and regard to the character of the area as well as strengthening of the Green Belt. The revised document is expected in July 2023 which would be likely to be material in the determination of any application.

The Cherwell Local Plan 2011-2031 - Part 1 was formally adopted by Cherwell District Council on 20th July 2015 and provides the strategic planning policy framework for the District to 2031. The Local Plan 2011-2031 – Part 1 replaced a number of the 'saved' policies of the adopted Cherwell Local Plan 1996 though many of its policies are retained and remain part of the development plan. The Council's Partial Review to meet Oxford's Unmet Housing Need was adopted in 2020. The relevant planning policies of Cherwell District's statutory Development Plan are set out below:

CHERWELL LOCAL PLAN 2011 - 2031 PART 1 (CLP 2031 Part 1)

Policy PSD1: Presumption in Favour of Sustainable Development
Policy SLE1: Employment Development
Policy SLE2: Securing Dynamic Town Centres
Policy SLE3: Supporting Tourism Growth
Policy SLE4: Improved Transport and Connections
Policy BSC1: District Wide Housing Distribution
Policy BSC2: The Effective and Efficient Use of Land – Brownfield land and Housing Density
Policy BSC7: Meeting Education Needs
Policy BSC8: Securing Health and Well-Being
Policy BSC9: Public Services and Utilities
Policy BSC10: Open Space, Outdoor Sport and Recreation Provision
Policy BSC11: Local Standards of Provision - Outdoor Recreation
Policy BSC12: Indoor Sport, Recreation and Community Facilities
Policy ESD1: Mitigating and Adapting to Climate Change
Policy ESD2: Energy Hierarchy and Allowable Solutions
Policy ESD3: Sustainable Construction

Policy ESD4: Decentralised Energy Systems
Policy ESD5: Renewable Energy
Policy ESD6: Sustainable Flood Risk Management
Policy ESD7: Sustainable Drainage Systems (SuDS)
Policy ESD8: Water Resources
Policy ESD9: Protection of the Oxford Meadows SAC
Policy ESD10: Protection and Enhancement of Biodiversity and the Natural Environment
Policy ESD11: Conservation Target Areas
Policy ESD12: Cotswolds Area of Outstanding Natural Beauty (AONB)
Policy ESD13: Local Landscape Protection and Enhancement
Policy ESD14: Oxford Green Belt
Policy ESD15: The Character of the Built and Historic Environment
Policy ESD16: The Oxford Canal
Policy ESD17: Green Infrastructure
Policy Kidlington1: Accommodating High Value Employment Needs
Policy Kidlington2: Strengthening Kidlington Village Centre
Policy INF1: Infrastructure

CHERWELL LOCAL PLAN 1996 SAVED POLICIES (CLP 1996)

Policy GB2 – Outdoor Recreation in the Green Belt
Policy TR1 - Transportation funding
Policy TR7 - Development attracting traffic on minor roads
Policy TR8 - Commercial facilities for the motorist
Policy TR10 - Heavy Goods vehicles
Policy TR11 - Oxford Canal
Policy TR22 - Reservation of land for road schemes in the countryside
Policy C5 - Protection of ecological value and rural character of specified features of value in the District
Policy C15 – Prevention of coalescence of settlements
Policy C18 – Development proposals affecting listed buildings
Policy C21 – Proposals for re-use of a listed building
Policy C23 – Retention of features contributing to character or appearance of a conservation area
Policy C28 – Layout, design and external appearance of new development
Policy C29 – Appearance of development adjacent to the Oxford Canal
Policy C30 – Design control
Policy C32 – Provision of facilities for disabled people
Policy C38 – Satellite dishes in conservation areas and on listed buildings
Policy C39 – Telecommunication masts and structures
Policy ENV1 – Development likely to cause detrimental levels of pollution
Policy ENV2 – Redevelopment of sites causing serious detriment to local amenity
Policy ENV6 – Development at Oxford Airport, Kidlington likely to increase noise nuisance
Policy ENV12 – Development on contaminated land

THE CHERWELL LOCAL PLAN 2011 - 2031 (PART1) PARTIAL REVIEW - OXFORD'S UNMET HOUSING NEED (PR2020)

Policy PR1 - Achieving Sustainable Development for Oxford's Needs
Policy PR2 - Housing Mix, Tenure and Size
Policy PR3 - The Oxford Green Belt
Policy PR4a - Sustainable Transport
Policy PR4b - Kidlington Centre
Policy PR5 - Green Infrastructure
Policy PR7b – Land at Stratfield Farm
Policy PR8 - Land East of the A44
Policy PR9 - Land West of Yarnton
Policy PR11 - Infrastructure Delivery
Policy PR12a - Delivering Sites and Maintaining Housing Supply
Policy PR12b – Sites Not Allocated in the Partial Review
Policy PR13 - Monitoring and Securing Delivery

Other Material Planning Considerations (not an exhaustive list)

Environmental Impact Assessment (EIA) Regulations 2017 (as amended)
National Planning Policy Framework (NPPF)
Planning Practice Guidance (PPG)

National Model Design Code
Cycle Infrastructure Design (LTN 1/20)
Fields in Trust - Guidance for Outdoor Sport and Play
Oxford Canal Conservation Area Appraisal

Supplementary Planning Documents
Developer Contributions SPD (Feb 2018)
Cherwell Residential Design Guide (July 2018)

EIA Methodology

Whilst many sections of OCC are listed in the Consultation and Scoping Opinion – OCC Education and Property are not listed as a key stakeholder and must be included in the consultation and scoping exercise.

At 4.23 of the Scoping Report, it is noted that the term “such as” is used to describe residential uses sensitive receptors. It is noted that this term does not preclude other uses being considered sensitive receptors and this should be considered through the formulation of the Environmental Statement.

It is noted that education sites, the canal moorings and existing natural habitats should be considered sensitive receptors should also be included as sensitive receptor areas as they will be occupied in the early phases of the development and impacted by the development.

It is also noted that the schools will generate noise and disturbance to surrounding uses once operational which may be early in the development process.

Otherwise the Scoping Report is broadly agreed.

Socio-Economics

Economic

The Scoping Report states at Para 5.13 that the proposals will deliver economic floorspace. This should be indicated at a minimum of the equivalent of 14.7ha of employment floorspace associated with the Science Park and additional floorspace as part of the Local Centre.

Recreation, Play and Sport

In respect of Paragraph 5.19, whilst it is noted that the distance generally considered appropriate for children aged between 12 and 18 to be able to walk to access play and open space, which is in line with Cherwell’s “accessibility standard” in its 2018 Developer Contributions SPD. The proposals should follow the standards in Fields in Trust Guidance for Outdoor Sport and Play ([Guidance-for-Outdoor-Sport-and-Play-England.pdf \(fieldsintrust.org\)](https://www.fieldsintrust.org/Guidance-for-Outdoor-Sport-and-Play-England.pdf)) and Recreations which stipulates following distances LAPs - 100m LEAPs – 400m, and NEAPs – 1,000m as walking distances from residential dwellings. Further 'Amenity Green Space' benchmark should be based on a minimum of 2.75 hectares per 1,000 people or the more commonly known 'Six Acre Standard'.

The role of the Canal in providing links and other recreational opportunities should also be acknowledged.

Schools

The scale of this proposed development requires on-site school provision. In the longer term it would be expected that the vast majority of pupils will attend primary and secondary schools within the development (families do, of course, have the right to choose alternative schools). In the short term, before new schools are built within the development, there would be expected to be movement out to existing primary schools in Yarnton and possibly Woodstock or Kidlington, and existing secondary schools in Woodstock and Kidlington. There would not be expected to be significant movement into Oxford, as pupils living closer to those school will have priority, and there are not expected to be spare places available to Begbroke residents.

The county council will assess the need for additional pupil capacity taking into account existing schools within the statutory walking distance, and in the wider context of growth in the area as set out in CDC’s and WODC’s Local Plans.

Paragraph 5.19 of the Scoping Report states “For social infrastructure, [the study area] is based on reasonable travel times from the Site or areas used by local authorities to plan and assess provision (particularly in the case of school place planning).” It should be noted that the standard definition of

“reasonable” distances for school planning relates to maximum statutory walking distances, set at 2 miles for primary schools and 3 miles for secondary schools. The school planning areas mentioned in this paragraph and para 5.25 cover considerably larger areas.

As well as the planned new primary school’s nursery, additional early years education and childcare provision could be through a mixed market of private and voluntary providers, including pre-schools, day nurseries and childminders. The inclusion of suitable accommodation for such uses within the development, for example within a local centre, could be considered. SEND capacity to serve this development is expected to be delivered off-site.

It should be noted that demand and supply of school places in this area is going through a period of rapid change, and will continue to do so in response to planned housing developments, including this one. The Education Sufficiency team at Oxfordshire County Council is able to advise as required on appropriate data regarding school place planning. In the first instance, the OCC Pupil Place Plan (available from www.oxfordshire.gov.uk) should be referred to. Data on the current situation and past trends needs to be supplemented with information about future plans and forecasts. The School Organisation team at Oxfordshire County Council will base its response to any future planning application on the latest available information.

Cultural Heritage

The Environmental Statement should consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk) and relevant local authority staff.

On local historic environment issues and priorities the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets. It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this. The assessment should also take account of the potential impact which is associated.

A Cultural Heritage and Archaeology chapter will need to be included in the EIA, as outlined in the scoping report. The methodology and sources outlined in the scoping report are generally acceptable, however, Section 6.23 should also include the forthcoming results of the trenched evaluation, as well as the geophysical survey results, in the assessment of the archaeological potential of the site.

The proposed mitigation and operational design should take account of the constraints and opportunities and influence the design of the masterplan.

Transport and Access

The EIA scoping report identifies the impacts to the assessed arising from the completed development as well as those from the cumulative development of the wider PR development sites. It is agreed that the list of likely potential significant transport and access related effects are identified in the scoping report (paragraphs 7.20 - 7.29). The study area and special scope for the area is agreed and is based upon the North Oxford VISSIM model extents.

The ES transport chapter will assess the following transport related environmental factors to be assessed for the construction and operational phases of the proposed development, these are the key receptors that would usually be assessed in any such ES: Issues related to;

- Severance
- Driver delay
- Pedestrian delay
- Pedestrian amenity
- Fear and intimidation
- Accidents and safety

The significance of these effects is to be assessed in line with IEMA Guidelines. The EIA will also be required to identify the environmental impacts of construction related activities and demonstrate that these can be appropriately mitigated, this will include the impacts of construction traffic on the

local highway network. A Construction Traffic Management Plan will need to be agreed with the LPA prior to implementation of the development and the scope of this and the Construction and Environmental Management Plan (CEMP) should be identified in the Environmental Statement.

The Local Highway Authority also identify in their consultation response to the Scoping Opinion the requirement for consideration of Parking Standards and Parking Controlled Zones, Car Clubs, Electric Vehicle Charging and Cycle Parking. The relationship of these to the development and trip internalisation should be noted. The development of sustainable travel choices should be outlined in the Transport Section of the Environmental Statement and in the Travel Plan.

In this case the A34 is the relevant consideration in terms of the Strategic Road Network (SRN). National Highways do not offer a view of the scope of EIA's as this is for the Local Planning Authority to determine. However, it is noted that the applicant provides further details of the proposed assessment to be undertaken and the scope of the Transport Assessment (TA) in section 7 of the submitted EIA scoping report. Based on this, National Highways would welcome a meeting to discuss the proposals and the potential impact on the SRN. It is essential that matters are agreed with the Local Highway Authority who are responsible for roads in the vicinity of the proposed site, therefore a joint meeting may be helpful. National Highways look forward to working with the Applicant and Oxfordshire County Council to develop the scope of the subsequent TA. National Highways would expect the TA to assess any potential impacts to the A34 and take into account any other development in the area.

There is an assumption in relation to the road closures at Sandy and Yarnton Lane, that is yet to happen, whilst this is Network Rails intention, there remain a number of stages to move through with no guarantee when and how this will be delivered. As such, there should be data reflective of the current state as well as proposed. We would expect to see details within the Transport chapter of the EA of how any future developments will impact on the Sandy Lane Level Crossing and Yarnton Lane Level Crossing and what mitigation is propose as part of the application, as per the requirement of point f. of Policy PR8 of Cherwell Local Plan 2011-2031 (Part 1): Partial Review – Oxford's Unmet Housing need.

Paragraph 7.3 states the route is currently closed to vehicles and only open to pedestrians and cyclists however it is understood that the route is currently open

Paragraph 7.37 refers to Yarnton LC being currently closed to vehicles however the Level Crossing is still open and used by vehicles – the cottage uses still uses the crossing. Yarnton LC closure should be considered in all scenarios.

There is also a need to understand the role of the Canal and its towpath in sustainable travel choices and the role of public rights of way. The Environmental Statement should identify the impact on the public rights of way network and the development and enhancement to reflect existing and future needs.

Noise and Vibration

The applicant is asked to consider the need for the canal corridor, users of the canal towpath and occupants of moored boats to be included as a sensitive receptor for pollution, including noise, in particular during the construction phase.

Oxford Airport

In respect of the movements, please see the below table provided by Oxford Airport on movement. Please note that the Airport highlight that there was a spike in movements in 2021 due to the flying schools making up for lost time from the pandemic and undertaking more flying hours.

Month/ Year	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
<i>January</i>	2481	1843	2161	2592	2495	2323	2013	3115	4107	1677
<i>February</i>	2692	2703	2717	3490	3532	2679	2512	3077	3534	4074
<i>March</i>	3478	2703	3595	3401	3637	3328	2739	3384	4014	5524
<i>April</i>	2814	3298	3999	4443	4067	3585	3126	3685	481	6628
<i>May</i>	4647	2791	3941	4049	4687	3411	3631	4204	1353	6450
<i>June</i>	3502	3795	4892	4844	3277	3797	4468	3687	3836	6095
<i>July</i>	4454	4441	4681	4365	3999	3614	4374	5430	5702	6702
<i>August</i>	4162	4096	3918	4245	3540	3643	4249	4915	4678	7192

<i>September</i>	3887	3178	4085	4387	3461	3268	3926	4800	5509	6789
<i>October</i>	3049	2770	3101	3468	2956	3043	3367	4914	4454	5388
<i>November</i>	3136	3624	2928	2606	3288	3158	2860	3636	4679	5716
<i>December</i>	2183	2414	2799	2522	1971	1862	2363	3139	3624	3680
Totals	40485	37656	42817	44312	40910	37711	39628	47986	45961	65915

Railway and Potential Railway Station

The impact of the noise of the railway on the development of the site should be fully understood and form part of the EIA with appropriate mitigation.

It is noted that the delivery of the potential Railway Station should be understood with the potential change in noise climate and profile of noise from stopping and re-starting from a railway station should be understood. Upgrade of the Cherwell Valley railway line, increase in rail movements and potential future Begbroke rail station should be included in the list of noise sources for the completed development and modelled accordingly.

The noise contour map of the existing baseline shows noise levels to the western boundary and land adjacent to the railway line to be above the permitted level of 50dB LAeq, 30min at the boundary for school sites. The existing number of rail movements of 15 trains per hour, equivalent to one every 4 minutes (item 8.2), and the anticipated increase in rail movements (item 8.8) will increase the noise levels. Noise will directly impact education delivery and is one of the reasons why a school must not be located adjacent to the railway line. The school location must meet the specified permitted noise level stated above unless otherwise agreed.

A44 and other local roads

The impact of the A44 should be accounted for in its current position but also the impact of future growth, investment in bus infrastructure on the A44 and the proposed development of the Oxford Airport Travel Hub should also be documented and factored into the development appraisal.

Impact to Begbroke Village and Yarnton Village residents and first residents of the development

The impact on existing residents from construction activity should be accounted for and included.

Air Quality

The applicant is asked to consider the need for the canal corridor, users of the canal towpath and occupants of moored boats to be included as a sensitive receptor for pollution including air quality/dust in particular during the construction phase.

It should be noted that measures should be included as a result of the introduction of climate policy, e.g. electric vehicle rollout and Future Homes Standard should be taken into account.

In respect of Para 9.10. the issue of remediation of the previously contaminated land and whether there would be any airborne contaminants released as part of bringing this into meaningful use would need to be accounted for in the Environmental Statement.

The aspects of the Noise Chapter may have a bearing on the air quality issues.

Climate Change and Greenhouse Gases

Oxfordshire councils have ambitious targets to reduce the amount of waste generated and increase the amount recycled as demonstrated in our Joint Municipal Waste Management Strategy 2018-2023. Enabling residents of new dwellings to fully participate in district council waste and recycling collections is vital to allow Oxfordshire's high recycling rates to be maintained and reduce the amount of non-recyclable waste generated.

Given the pressing urgency of climate change and the need to embed the principles of the circular economy into all areas of our society, we encourage the applicant to consider including community spaces that help reduce waste and build community cohesion through assets such as community fridges, space for the sharing economy (library of things), refill stations, space for local food growing etc. We encourage the use of local, natural and sustainable materials with as much reuse and as little waste as possible in line with Circular Economy objectives. At the detailed application stage, we expect to see plans for how the developer will design the development in accordance with waste management policies in Cherwell District Council's waste planning guidance. Bin storage areas must be able to accommodate the correct number of mixed recycling, refuse and food recycling bins; be

safe and easy to use for residents and waste collection crews and meet the requirements of the waste collection authority.

Other aspects of climate change should also be considered through addressing the requirements of Policies ESD1-5 of the Cherwell Local Plan Part 1 2011-2031. The use of renewable energy provision on site should be considered alongside an energy strategy for the site.

Biodiversity

Designated and Non-Designated Sites

Rushy Meadows SSSI, is located within approximately 10m of the north eastern Site boundary. The SSSI citation for Rushy Meadows states:

“This site consists of a series of unimproved alluvial grasslands alongside the Oxford Canal, in which low-intensity, traditional management has produced rich meadow and fen communities containing several uncommon species. Meadow habitats of this type are now both rare and under threat in Britain. Rushy Meadows represents one of the few surviving sites in a district where such grasslands have declined in area following agricultural improvement and urban development.”

Oxford Meadows Special Area of Conservation and Pixey and Yarnton Meads SSSI are located approximately 1.8km south of the Site. Oxford Meadows includes vegetation communities that are perhaps unique in the world in reflecting the influence of long-term grazing and hay-cutting on lowland hay meadows. Pixey and Yarton Meads SSSI are unimproved flood meadows on the bank of the river Thames. They have been grazed and cut for hay for more than a thousand years, with the result that they are botanically rich, with more than 150 species.

In addition, there are 17 other non-statutory designated sites and three areas of Ancient Woodland within a 2 km radius of the Site. Given the ecological sensitivity of this area it is essential that the EIA should include results of appropriate surveys, and an assessment of impact on each designated site. These must deal with potential impacts on both nationally and locally designated sites and how these will be avoided and if they cannot be avoided how the benefits of the development in the location proposed outweigh both its likely impact on the features of the designated site, and how the impacts will be mitigated.

Rowel Brook runs through the north of the site feeding into the Oxford Canal which runs along the eastern boundary of the site. The EIA must fully assess whether the proposed development is likely to have any adverse impact on these water channels. This will need to include an assessment of possible impacts, and a detailed description of mitigation measures that will be carried out and how they will ensure there will be no impact.

The site also contains hedgerows, areas of semi-improved grassland, woodland corridors and a pond with great crested newts, all of which are considered Habitats of Principle Importance. The EIA must fully demonstrate the measures which will be taken to ensure that there is no negative impact on these habitats (including hedgerows see below) and any other priority habitats nearby.

Paragraph 11.4 of the applicant's scoping report notes that bat roosts are present in Begbroke Hill Farmhouse and an adjacent building within Begbroke Science Park, and a range of bat species use the hedgerow network within the Site for foraging and commuting. The pond within the Begbroke Science Park contains a small breeding population of GCN and other protected species identified on-site include water vole, breeding birds (including Species of Principal Importance ('SPIs') such as skylark, red kite, and house sparrow), and reptiles. In addition, brown hairstreak butterfly (a SPI) was found to breed at the site.

The EIA should include results of appropriate surveys, an assessment of impact, and details of mitigation, compensation and enhancement measures. These must deal with impacts on priority species (including breeding birds see below) on site and any priority species nearby.

Hedgerows

Hedgerows should be retained and enhanced. In exceptional circumstances if proposals involve removal of small sections of hedgerow for access purposes then a substantially longer section of hedgerow should be planted elsewhere on site to provide compensation.

A management regime should be put in place for hedgerows across the site including a three-year rotation for trimming and allowing some stretches of hedgerow to remain untrimmed for longer. There should also be at least a 15m buffer between any development and the hedgerows. These buffers

should be maintained as dark corridors and should be of appropriate semi-natural priority habitat such as a mosaic of scrub and species-rich grassland.

Protected Species

DEFRA has provided guidance to competent authorities (including local authorities) on how to comply with the legal requirements of the Conservation of Habitats and Species Regulations 2017 (as amended). The guidance is available at: <https://www.gov.uk/guidance/providing-and-protecting-habitat-for-wild-birds>

The guidance states that: “As a competent authority, [the Local Planning Authority] must help to provide, protect and restore habitats for wild birds. This will help to make sure there are healthy populations of wild birds in their natural habitats across England and Wales... ..

The LPA has a duty therefore to:

- preserve, manage and re-establish habitat that is large and varied enough for wild birds to support and maintain their populations in the long term
- avoid any pollution or deterioration of wild bird habitat as far as possible

The EIA should set out the steps that will be taken to “preserve, manage and re-establish habitat that is large and varied enough for wild birds to support their population in the long term” in relation both to “wild birds that are in decline” and to “wild birds with healthy populations”

With respect to any priority species impacted, the developer must show that the habitats provided on site will be sufficient to maintain or enhance the same populations of these species. Skylark and some other priority species will require large areas of undisturbed habitat.

Conservation Target Area

The Lower Cherwell Valley Conservation Target Area (‘CTA’) extends into the north-eastern corner of the site. Oxfordshire Biodiversity Action Plan Targets associated with this CTA are lowland meadow – management, restoration and creation, floodplain grazing marsh – management, restoration and creation, lowland Fen (including swamp) – management and restoration, reedbed – management and creation, rivers – management and restoration (including management for water vole). We would therefore recommend that habitats to be created should include lowland meadow, wet grassland, and if possible, reedbed and lowland fen. BBOWT has developed proposals for a restoration project with bankside habitat improvements along the canal to support water vole and the Rowel Brook is regularly surveyed by the BBOWT Water Vole Project and has good potential itself.

Achieving a net gain in biodiversity

The biodiversity net gain should be calculated using the latest biodiversity accounting metric published by Natural England and all calculations should be provided with the documentation available to consultees as part of any planning application.

If it is not possible to provide a net gain in biodiversity as required by planning policy then off-site compensation will be required. One option is for Trust for Oxfordshire (TOE) <https://www.trustforoxfordshire.org.uk/> which is an independent charity with strong relationships with local planning authorities, developers and landowners across the county which may be able to assist the applicant in meeting its net gain obligations. On site provision would however be preferable.

Access vs. undisturbed areas

It is essential that the development ensures appropriate mitigation and creation for biodiversity and green space for recreation. Policy PR8 - Land East of the A44 and the accompanying policies map of The Cherwell Local Plan 2011 - 2031 (Part1) Partial Review Key Delivery Requirements 8, 9, 10 and 11 set out what is required in relation to the Local Nature Reserve, nature conservation area, other public open green spaces and retained agricultural land.

The management of these areas should be geared first and foremost towards wildlife conservation and detailed management plans should be submitted with any planning application, showing how the land will be managed for the duration of the time that the land is built on (e.g. in perpetuity).

The application should also specify which organisation/s will carry out this management and these should be experienced in the management of land for the benefit of wildlife. Whilst some form of public access can be permitted in order to allow residents to enjoy the natural green spaces, in order to provide the substantial benefits for wildlife that will be needed to achieve a net gain in biodiversity that is focused primarily on site, then there should not be public access across the entire area of the green infrastructure.

Zoning, and a 'hierarchy' of access levels of the combination of all green areas should be carefully planned, including consideration of main paths/cycle routes (with an appreciation of the most obvious routes that people are likely to want to follow: 'desire lines'). There should be informal recreation along a network of paths and openly accessible spaces included within a mosaic of areas that are closed off by appropriate use of hedgerows, screens, fencing and ditches. Broad zones might help keep some larger restricted access nature conservation blocks 'quiet' rather than fragmenting areas too much. This would be simpler for residents and visitors to understand and will allow wildlife to thrive and be observed from paths. The need to have some areas without direct public access is supported by a research report published by Natural England 'Is the management of Local Wildlife Sites affected by the urban fringe?'

Proposals for wildlife management and maintenance

The EIA should include measures for management and governance and how the Green Infrastructure would be managed in perpetuity and proposals should recognise this commitment. It may be that an endowment fund will be needed to ensure that management costs can be covered.

Lighting

The need for lighting should be assessed. If lighting of walkways is needed for winter then low height and light level bollard lighting would be preferable. Bright security style type lighting would be of very serious concern in terms of impact on wildlife, particularly bats. Lighting must be directed away from the hedgerows and woodlands, and light spill into these areas should be avoided through use of cowls or equivalent. In addition, the choice of lighting type is critically important, as there are wide variations in wildlife impact depending on the spectra of lighting. The choice of lighting type will impact on whether invertebrates are attracted to lights, with negative impacts on them, and also on the impact upon bats, birds and other wildlife

Paragraph 17.9 of the scoping report is noted however, given the ecological sensitivity of this area the impact of lighting on biodiversity should be acknowledged, assessed and measures to minimise this impact should be included in the EIA.

Biodiversity in built development

Any application should maximise the provision of such rooves and install solar panels on rooves which are not green rooves. The extent of biodiversity will depend on the type of green roof installed. Sedum roofs benefit a limited range of invertebrates and provide foraging for pollinators when in flower. Ecologically designed extensive green roofs can provide good habitat for wildlife, but there are limitations in terms of replicating habitat at ground level due to shallow depth of soils and the drying effect of wind and sun. According to www.livingroofs.org, a good green roof designed for biodiversity should include a varied substrate depth planted with a wide range of wildflowers suitable for dry meadows.

Wildlife connectivity between gardens can be achieved by allowing gaps in fencing and walls for hedgehogs and other small animals to roam, e.g. hedgehog streets in Kirtlington. This can be used to raise awareness of wildlife within the community.

Ground Conditions and Contamination

The presence of a foul water pipe and sewer crossing the site is noted however the exact trajectory is not shown. The presence of underground pipes is not permitted on school sites and should be shown in relation to the proposed education sites. Further guidance can be found in the Design Criteria for Primary and Secondary Schools.

The applicant is asked to consider the need for the canal corridor, users of the canal towpath and occupants of moored boats to be included as a sensitive receptor for pollution including the management and remediation of contamination in particular during the construction phase.

Contamination related to the creation of the Central Park concept should be clearly set out in ensuring that the area is fit for use.

Agricultural Land and Soils

The agricultural land being retained should be understood in terms of its existing farming and agricultural holding and how this would be affected. The retained land would need to be outlined in terms of its long-term viability including the need for a farmstead, equipment storage and/or other storage. The potential need for agricultural workers dwelling should also be explored.

Water Resources and Flood Risk

LLFA

Section 13.26 lists regulation and guidance which will be considered in the preparation of FRA. However, there is no mention of the LLFA local guidance.

An FRA and/or surface water management strategy must be in line with our local guidance. A detailed surface water management strategy must be submitted in accordance with the Local Standards and Guidance for Surface Water Drainage on Major Development in Oxfordshire.

In line with this guidance, runoff must be managed at source (i.e. close to where it falls) with residual flows then conveyed downstream to further storage or treatment components, where required. The proposed drainage should mimic the existing drainage regime of the site as much as possible.

The applicant is required to provide a Surface Water Management Strategy in accordance with the following guidance:

The Sustainable Drainage Systems (SuDS) Policy, which came into force on the 6th April 2015 requires the use of sustainable drainage systems to manage runoff on all applications relating to major development. As well as dealing with surface water runoff, they are required to provide water quality, biodiversity and amenity benefits in line with National Guidance. The Sustainable Drainage Systems (SuDS) Policy also implemented changes to the Town and Country Planning (Development Management Procedure) (England) Order 2010 to make the Lead Local Flood Authority (LLFA) a statutory Consultee for Major Applications in relation to surface water drainage. This was implemented in place of the SuDS Approval Bodies (SAB's) proposed in Schedule 3 of the Flood and Water Management Act 2010.

All full and outline planning applications for Major Development must be submitted with a Surface Water Management Strategy. A site-specific Flood Risk Assessment (FRA) is also required for developments of 1 hectare or greater in Flood Zone 1; all developments in Flood Zones 2 and 3 or in an area within Flood Zone 1 notified as having critical drainage problems; and where development or a change of use to a more vulnerable class may be subject to other sources of flooding.

Further information on flood risk in Oxfordshire, which includes access to view the existing fluvial and surface water flood maps, can be found on the Oxfordshire flood tool kit website. The site also includes specific flood risk information for developers and Planners.

The National Planning Policy Framework (NPPF), which was updated in February 2019 provides specific principles on flood risk (Section 14, from page 45). National Planning Practice Guidance (NPPG) provides further advice to ensure new development will come forward in line with the NPPF.

Paragraph 155 states; "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere."

As stated in Paragraph 158 of the NPPF, we will expect a sequential approach to be used in areas known to be at risk now or in the future from any form of flooding.

The Non-statutory technical Standards for sustainable drainage systems were produced to provide initial principles to ensure developments provide SuDS in line with the NPPF and NPPG. Oxfordshire County Council have published the "Local Standards and Guidance for Surface Water Drainage on Major Development in Oxfordshire" to assist developers in the design of all surface water drainage systems, and to support Local Planning Authorities in considering drainage proposals for new development in Oxfordshire. The guide sets out the standards that we apply in assessing all surface water drainage proposals to ensure they are in line with National legislation and guidance, as well as local requirements.

The SuDS philosophy and concepts within the Oxfordshire guidance are based upon and derived from the CIRIA SuDS Manual (C753), and we expect all development to come forward in line with these principles.

In line with the above guidance, surface water management must be considered from the beginning of the development planning process and throughout – influencing site layout and design. The proposed drainage solution should not be limited by the proposed site layout and design.

Wherever possible, runoff must be managed at source (i.e. close to where it falls) with residual flows then conveyed downstream to further storage or treatment components, where required. The proposed drainage should mimic the existing drainage regime of the site. Therefore, we will expect existing drainage features on the site to be retained and they should be utilised and enhanced wherever possible.

Although we acknowledge it will be hard to determine all the detail of source control attenuation and conveyance features at concept stage, we will expect the Surface Water Management Strategy to set parameters for each parcel/phase to ensure these are included when these parcels/phases come forward. Space must be made for shallow conveyance features throughout the site and by also retaining existing drainage features and flood flow routes, this will ensure that the existing drainage regime is maintained, and flood risk can be managed appropriately.

By the end of the Concept Stage evaluation and initial design/investigations Flows and Volumes should be known.

Environment Agency

The response and comments of the Environment Agency will be forwarded to the applicant team as part of ongoing discussions as they have been unable to provide comments to be included here. This response will form part of the Council's Scoping Opinion and full regard should be had to these comments once received and provided.

Canal Corridor

The role and opportunity of the Canal Corridor in the provision of water through the construction activity has been highlighted by the Canal and Rivers Trust.

Thames Water

Thames Water are satisfied that the report has considered the Water and sewerage needs of the development as set out in The EIA Regulations 2017 Schedule 4

Landscape and Visual

The LPA has engaged and agreed with the applicant's consultants on the position of the viewpoints and landscape assessment.

If it is available to view the Churches to the West and Southeast may be an appropriate viewpoint (if the towers/spires are available). The applicant team have taken note of the request to capture any visibility of the Churches to the west and south-east of the Application Site (if visibility of them is available) from any of the agreed viewpoint locations.

It has also been suggested that modelling of some areas to taller potential buildings in key nodes should be discussed. This could be, for example up to 17.5m for residential and 21.9m for commercial. It is agreed to show and test these parameters; and when it would be appropriate to share the results of this design testing.

Cumulative Effects

Begbroke Science Park has a long history with a significant number of planning applications of varying types over a significant period of time. The majority of the proposals have been to increase the number and scale of buildings on the site and to complement and expand the existing research and development facilities as well as other uses within the site.

The BBOWT highlight that the EIA should evaluate potential negative impacts on features of nature conservation importance that may arise as a result of other plans and projects either existing, in

development or proposed. Appropriate measures to avoid, mitigation or compensate for these negative impacts should be specified within the EIA.

The list of developments in Appendix A are noted and considered. The list at Appendix A of the Scoping Report should be kept under review.

The following planning history is considered directly relevant to the current proposal:

18/00803/OUT - Outline planning permission, with all matters except for access reserved for subsequent approval, for up to 12,500m² of B1a / b / c and ancillary D1 floor space, retention of and improvements to the existing vehicular, public transport, pedestrian and cycle access including internal circulation routes; associated car parking including re-disposition of existing car parking; associated hard and soft landscape works; any necessary demolition (unknown at this stage); and associated drainage, infrastructure and ground re-modelling works - Granted 17th September 2018

21/03150/REM - Reserved Matters application for 18/00803/OUT - the design, layout, external appearance and landscaping (as required by OPP Condition 1). It also includes the information required by conditions 4, 5 and 21 of the OPP. Submitted scheme also accords with the requirements of conditions 6, 7, 8, 9 and 14 of the OPP - Reserved Matters Approved 27/01/2022

21/01699/NMA - Non-Material Amendment to 18/00803/OUT to raise the height of the approved buildings by 60cm from 12.6m to 13.2m. Granted 8th June 2021.

22/01610/NMA - Change from one single central flue on the academic building to several which would be 300 mm higher than those previously approved plus changes to the design of the approved weed garden, including the addition of a ramp, relocation of the sink and events area and a material change of the main access path from Colas Fibredec to stone crazy paving (proposed as non-material amendments to 21/03150/REM) – Approved 28/06/2022

22/02071/NMA - Change to the wording of condition 4 (contamination) (proposed as non-material amendment to 21/03150/REM) – Approved 11/08/2022

22/03355/NMA - Updates to the chosen brick from grey blend to buff/ grey blend and an update to the shading fins from 'brass' colour to 'champagne' colour (proposed as non-material amendment to 21/03150/REM) – Approved 17/11/2022

21/03195/F - Formation of surface car park and service building (including substation, sprinkler tanks and EV charging infrastructure) – Approved 04/02/2022

22/01789/NMA - Substitution of permeable block paving to parking bay surfacing with a porous bituminous macadam surface (proposed as non-material amendment to 21/03195/F) – Refused - 14/07/2022

22/02372/NMA - Non-material amendment to 21/03195/F - The Non-Material Amendment proposes the substitution of permeable block paving to parking bay surfacing with a porous bituminous macadam surface - Approved 02/09/2022

Outside the Science Park, there is the consideration of the Sandy Lane Crossing being carried out by Network Rail and the Oxford Phase 2 Enhancement Works. Whilst an application is yet to be submitted the detail is outlined in an EIA Screening Opinion request submitted in 2022.

22/03054/SO - Request for an EIA Screening Opinion in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, in respect of the proposed closure of Yarnton Lane level crossing and Sandy Lane level crossing as part of the Oxford Phase 2 Enhancement Works – Environmental Statement Not Required - 27/10/2022

There is a current planning application 21/03522/OUT for the PR9 site at Yarnton. The main access to that site will come from an amended junction on the A44 which also serves this PR8 site.

There are also synergies with other sites allocated in the Partial Review, in particular PR7b which is also the subject of current planning applications, including 22/01611/OUT for 118 dwellings as a new

pedestrian/cycle bridge of the canal is identified in the Local Plan as being required between that site and the application site.

For the purposes of the cumulative assessment, the other aspects/developments also to be considered are set out below. Whether these are considered committed developments under EIA Regulations will need to be monitored and assessed:

- The remaining parcels of the allocation (PR8)
- Oxford Airport travel hub (being developed by Oxfordshire County Council)
- Oxford Technology Park (Technology Drive, Kidlington)
- The operations of London Oxford Airport
- The potential re-location of Oxford United Football Club is also considered however at what stage this reaches at the time of submission will need to be considered and monitored. OCC Cabinet papers have been released for the meeting on 24 January 2022 in relation to OUFC proposals.

Non-significant topics

The list of non-significant topics is agreed with the exception of where they form part of the consideration inter-related to a matter of significance and appropriate mitigation is necessary (e.g., biodiversity and lighting).

Publication

It is expected that the Environmental Statement will be accompanied by a Non-Technical summary document.

Digital Copies of the Environmental Statement (e.g. through USB sticks or digital links) should be made available to Parish Councils and Ward Members. Digital copies of the Environmental Statement should be made available free of charge. The applicant should undertake a GDPR check as part of any document submitted.

Any confidential document (e.g. badger survey) should be clearly labelled with a public and redacted version being made available. Unredacted versions should be forwarded to the appropriate body for consideration.

Hard copies of the Environmental Statement should be made available at the Council Offices and at a suitable location in the Science Park. Additional copies or requests for a hard copy should be charged at reasonable rates in accordance with guidance.

There are consultation bodies that have not yet responded to the Council's notification of this scoping report. Should any further comments be received, they shall be forwarded by separate cover for consideration within the ES.

In the meantime, it is trusted that this information is of assistance to you in the formulation of an Environmental Statement and should be treated as the Council's formal Scoping Opinion made under the Environmental Impact Assessment Regulations 2017 (as amended).

Yours faithfully



David Peckford
Assistant Director – Planning and Development

Checked By: Caroline Ford