

COUNTY COUNCIL'S RESPONSE TO CONSULTATION ON THE FOLLOWING DEVELOPMENT PROPOSAL

District: Cherwell

Application No: 19/01255/SCOP

Proposal: Scoping opinion - Redevelopment of existing 9 holes of the wider 18 hole course at Bicester Hotel Golf and Spa to provide a new leisure resort (sui generis) incorporating waterpark, family entertainment centre, hotel, conferencing facilities and restaurants with associated access, parking and landscaping.

Location: Bicester Hotel Golf And Country Club Akeman Street Chesterton

This report sets out the officer views of Oxfordshire County Council (OCC) on the scope of the Environmental Impact Assessment for the above proposal.

Response date: 8th August 2019

Signed off by: David Flavin

Title: Senior Planner

Application No: 19/01255/SCOP

Location: Bicester Hotel Golf and Country Club Akeman Street Chesterton

Transport Schedule

Comments:

The EIA Scoping report includes a chapter on Transport and Access. Other chapters on air quality and noise are also of interest to the county council as changes in traffic flows can have an impact on these matters.

The Transport and Access chapter sets out some of the baseline conditions for the development site and sets out that the sensitive receptors have been identified as: Pedestrians, cyclists bus passengers and car drivers.

Pedestrians and cyclists are identified as having a low sensitivity and paragraph 6.3.2 states that *'It is anticipated that pedestrians would continue to use nearby footpaths whilst cyclists are likely to use quieter back roads'*

However, the A4095 at Vendee Drive end is signed cycle route and there are limited 'quieter back roads' that cyclists could choose to use in the vicinity of the site.

With regards to pedestrians, the impact of the development could be significant by creating severance or reducing opportunities for safe crossing in the vicinity of the site, should the development significantly increase traffic flows on adjacent links.

I would therefore question the conclusion that pedestrians and cyclists would have a 'low' sensitivity to the effects of the development.

Methodology

Paragraphs 6.7.3. and 6.7.4. defines the severity of 'effect' purely according to percentage increase in traffic flows.

6.7.4 states that the IEMA provides *'a threshold for judging the significance of an effect on amenity as a doubling of traffic flow on a link. This criteria will be used for assessing the impact of the Proposed Development and should traffic flow double on any nearby link, this will be considered a significant effect on amenity.'*

It is not set out in the scoping report how the impact on delay would be assessed.

The significance of the development's impact on delay and amenity will also depend on the baseline flows and characteristics of the link; for example a link which experiences high traffic flows may be more susceptible to delays at junctions with a low percentage increase of additional traffic (for instance a 5% increase) and this could have a more significant impact on delay and amenity than which may be the case for a very quiet road experiencing a 100% increase in traffic flows. Paragraphs 6.7.3 and 6.7.4 would suggest that the percentage increase is the only criteria

against which the 'effect' of the development on delay and amenity would be considered and scoping note does not set out how the impact in delay would be assessed.

The methodology also provides no information on how the effect of severance would be assessed.

Currently the scoping note includes limited information about the methodology and content of the TA to accompany the planning application. This will need to be updated as the detail is determined. However, the county council has provided some pre-application scoping advice on the TA methodology and this pre-app is ongoing.

I would also like to add that, whilst the TA report will consider the impact of traffic generated by the development during agreed peak periods, the EIA is obliged to assess the impacts of total traffic across the day. There is no acknowledgment of this in the scoping note.

Mitigation

In terms of mitigation, I would not say that the Travel Plan is an opportunity to enhance the environment as indicated in paragraph 6.6.1, it is more a measure required to reduce the detrimental impact of the development upon the environment.

It may be appropriate to list the staff and shuttle bus service in the range of mitigation measures in its own right in paragraph 6.5.1, rather than having this just identified as a Travel Plan measure in the paragraph below. The shuttle bus service is likely to be the main mitigation measure with respect of reducing single-occupancy car journeys to the site for both staff travelling locally and for visitors arriving from the Bicester stations.

Public Rights of Way

The EIA should include public rights of way and publicly accessible routes and greenspace as part of traffic and transport assessment – although the assessment and impact criteria will be different. The development site offers the opportunity to create a new route around the site as mitigation and also to enhance the quality and attractiveness of the development.

Travel Plan

A full Travel Plan is required for this development. This shall need to be produced prior to first occupation and then updated 6 months after opening when adequate survey data becomes available. The travel plan shall need to offer of personalised travel planning for staff and ensure all employees are aware of the travel choices available to them from the outset.

Further information regarding travel plan criteria and thresholds can be found within OCC's guidance document 'Transport for New Developments - Transport Assessments and Travel Plans – March 2014'.

Construction Traffic Management Plan

Given the scale of development there will be a request for a Construction Traffic Management Plan (CTMP) at the formal submission of a planning application.

However, failing this there will be a condition on any planning approval if this is the case requesting a CTMP. The correct level of detail must be provided to allow us to discharge the condition if this is the situation.

Officer's Name: Tim Peart

Officer's Title: Senior Transport Planner

Date: 6th August 2019

Application No: 19/01255/SCOP

Location: Bicester Hotel Golf And Country Club Akeman Street Chesterton

Local Lead Flood Authority

Recommendation:

Objection

Key issues:

Drainage detail to be provided as per pre-application advice sent 5th June and email sent 22nd June to Michael Smith of Curtins.

Detailed comments:

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 a 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. Therefore, we ask that the following Pro-Forma is completed and returned as soon as possible:

Officer's Name: Adam Littler
Officer's Title: Drainage Engineer
Date: 08 August 2019

Application No: 19/01255/SCOP

Location: Bicester Hotel Golf And Country Club Akeman Street Chesterton

Archaeology Schedule

Comments:

We agree with the proposed assessment of the archaeological interest and potential of the site included in Chapter 10 of this scoping report.

The applicant's documentation states that a desk based assessment (DBA) has been prepared assessing the archaeological potential of the site. This has been undertaken in line with the Chartered Institute for Archaeologists standards and guidance.

This DBA should be included within the cultural heritage chapter of eth EIA as proposed in this scoping report.

A programme of archaeological investigation will need to be undertaken ahead of the determination of any planning application for the site and the results used to inform the archaeological baseline of the assessment. This has been highlighted within the scoping report.

Officer's Name: Richard Oram

Officer's Title: Planning Archaeologist

Date: 1st August 2019
