

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

District: Cherwell

Application no: 22/03763/SCOP

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

Response Date: 12th January 2023

This report sets out the officer views of Oxfordshire County Council (OCC) on the above proposal. These are set out by individual service area/technical discipline and include details of any planning conditions or Informatives that should be attached in the event that permission is granted and any obligations to be secured by way of a S106 agreement. Where considered appropriate, an overarching strategic commentary is also included. If the local County Council member has provided comments on the application these are provided as a separate attachment.

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General Information and Advice

Recommendations for approval contrary to OCC objection:

If within this response an OCC officer has raised an objection but the Local Planning Authority are still minded to recommend approval, OCC would be grateful for notification (via planningconsultations@oxfordshire.gov.uk) as to why material consideration outweighs OCC's objections, and to be given an opportunity to make further representations.

Outline applications and contributions

The anticipated number and type of dwellings and/or the floor space may be set by the developer at the time of application which is used to assess necessary mitigation. If not stated in the application, a policy compliant mix will be used. The number and type of dwellings used when assessing S106 planning obligations is set out on the first page of this response.

In the case of outline applications, once the unit mix/floor space is confirmed by reserved matters approval/discharge of condition a matrix (if appropriate) will be applied to establish any increase in contributions payable. A further increase in contributions may result if there is a reserved matters approval changing the unit mix/floor space.

Where a S106/Planning Obligation is required:

- **Index Linked** – in order to maintain the real value of S106 contributions, contributions will be index linked. Base values and the index to be applied are set out in the Schedules to this response.
- **Administration and Monitoring Fee - TBC**
This is an estimate of the amount required to cover the monitoring and administration associated with the S106 agreement. The final amount will be based on the OCC's scale of fees and will be adjusted to take account of the number of obligations and the complexity of the S106 agreement.
- **OCC Legal Fees** The applicant will be required to pay OCC's legal fees in relation to legal agreements. Please note the fees apply whether a S106 agreement is completed or not.

Security of payment for deferred contributions - Applicants should be aware that an approved bond will be required to secure a payment where a S106 contribution is to be paid post implementation and

- the contribution amounts to 25% or more (including anticipated indexation) of the cost of the project it is towards and that project cost £7.5m or more
- the developer is direct delivering an item of infrastructure costing £7.5m or more
- where aggregate contributions towards bus services exceeds £1m (including anticipated indexation).

A bond will also be required where a developer is direct delivering an item of infrastructure.

The County Infrastructure Funding Team can provide the full policy and advice, on request.

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Strategic Planning

This EIA scoping application relates to a large part of the allocated PR8 site at Begbroke. It is by Oxford University Development (OUD) for land they own. The description of the proposal as set out in 3.2 of the scoping report includes a minimum of 1,750 dwellings, employment uses, schools and related uses.

The County Council is involved in providing pre-application advice to OUD. The County Council acknowledges that development is allocated and intends to provide advice so that appropriate development can be designed and provided for. At the current time there is no CIL charging in Cherwell District, and the County Council will seek a combination of direct delivery and S106 contributions towards necessary infrastructure.

A smaller part of the allocated PR8 site has already been subject to an EIA scoping application: 21/00758/SCOP. That application is on land owned by Hallam Land Management and is for 300 homes. Cherwell District Council issued its scoping opinion on that on July 2021.

Cherwell District Council intends to issue a Development Brief for this site. Development Briefs have been approved for all the other sites allocated in the Local Plan Partial Review. However, a draft Development Brief for this site has not yet been the subject of public consultation. The County Council will comment on a draft development brief when it is available.

Cherwell District Council is in the process of preparing a new local plan. Although the Local Plan Partial Review indicated the need for 14.7ha for employment, it is understood that the forthcoming new Cherwell Local Plan to 2040 will formalise that requirement for employment land, which is to address a need for additional employment in Cherwell District.

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 this.

Network Rail is developing proposals to close two level crossings which have been subject to EIA screening 22/03054/SO. There is reference to the proposals in 2.32 of the scoping report for this application, and the reference to the EIA screening reference

number is in Appendix A. Cherwell District Council issued a decision in October 2022 that those proposals are not EIA development.

The 170ha site identified in figures 1.1 and 1.2 as the indicative planning application boundary, includes land which has been taken out of the Green Belt, and land which is retained within the Green Belt. It also encompasses the existing Begbroke Science Park. Although it is unfortunate that a single planning application covering the entire site with its different landowners is not proposed, we welcome the inclusion of all the land that OUD owns in the application. The Development Brief will help with providing a more comprehensive understanding of all the 190ha PR8 allocated site including land in other ownerships.

The quantum of development referred to in the scoping report is at least 1,750 dwellings, which, together with the 300 dwellings indicated for the Hallam Land portion of the allocation, and additional development potential on smaller portions of privately owned land, totals more than the 1,950 dwellings expected in the PR8 allocation. If there are more houses on this site than anticipated in the allocation, then we expect that these will be entirely addressing Oxford City's unmet needs. As Highway Authority and Education Authority, we are interested in the quantum in relation to potential effects on the highway network and the requirement for school places. The County Council is interested in the total quantum also for other reasons, for example if it affects the ability to accommodate other uses on the site.

A key interest of the County Council is on identifying suitable land for the necessary new schools. The allocation envisages a secondary school site of 8.2ha, a 3FE primary school of 3.2ha and a 2FE primary school of 2.2ha. The County Council will require land for the schools to be transferred to County Council ownership. The exact sizes of the sites will be informed through preapplication discussions. Figure 3.1 is an illustrative masterplan layout. It shows one primary school in a central location which appears to be an appropriate location. A secondary school is shown adjoining the railway line and does not appear to meet the County Council guidance for school locations. A second primary school is missing from the illustrative masterplan. Changes to the illustrative masterplan are therefore envisaged in respect of the school sites.

Paragraph 3.14 indicates that the planning application will be submitted in outline with all matters reserved except for the principal means of access to the site. This appears to be appropriate, and we would expect all motorised vehicle access points to be detailed.

Paragraph 4.2 identifies consultation with Oxfordshire County Council in relation to 'Highways and Transportation, Ecology, Heritage, Flood Risk and Drainage, and Waste'. Oxfordshire County Council's interests are wider, so the above is not a good characterisation. Our interests include:

- Transport - the County Council is the Local Highways Authority.

- Public Rights of Way - the County Council maintains and protects the public right of way network.
- Innovation - the County Council expects that an Innovation Plan will be prepared in respect of proposals such as this.
- Digital connectivity – the County Council expects that developers will engage with a telecommunications network provider to provide a full fibre connection to each premise.
- Flooding and Drainage - the County Council is the Lead Local Flood Authority.
- Education - the County Council is the Education Authority.
- Social Care Housing - the County Council provides adult social care and will require some affordable housing to be extra care housing where it is needed.
- Waste Management - the County Council is the Waste Disposal Authority responsible for waste recycling centres and disposal sites.
- Archaeology - the County Council assesses planning applications in relation to archaeological resources.
- Healthy Place Shaping - the County Council supports healthy place shaping as part of its public health function and can assist the District Council in its review of a Health Impact Assessment which should accompany an application.
- Property and Assets - property and assets such as schools, fire stations, libraries, adult day care centres, children's homes, and museums need to be provided, protected and improved where possible.

The EIA scoping report paragraph 4.12 does not identify the need for an Innovation Plan as referred to above, or the need for a Community Employment Plan which is expected on this site - see

<https://www.oxfordshirelep.com/community-employment-plans>.

Paragraphs 17.18 to 17.25 confirm that a Health Impact Assessment will be submitted with the outline planning application. This is supported.

Section 10 of the EIA scoping report details how the application will address climate change and greenhouse gases. The County Council expects that the need to ensure that this is a low carbon development that meets objectives in relation to climate change and innovation will be a key matter for the District Council to consider in respect of outline and future reserved matters planning applications for this development and therefore the full range of ways to address climate change should be scoped in.

Section 14 of the EIA scoping report details water resources and flood risk. Parts of the site are in Flood Zones 2 and 3 at risk of fluvial flooding; additional parts are subject to surface water flooding; and groundwater flooding may also be a risk. There are known issues of capacity in the foul drainage system and at sewerage treatment works, and there may also be capacity issues for future water supply. The County Council expects that the means of addressing the water and flood issues for this site will be a key work area during the preapplication and application stages. The County Council as LLFA, Thames Water, the Environment Agency and Cherwell District Council will all need to be involved.

In Appendix A of the scoping report, which lists nearby developments, application 21/01695/FUL for Thornhill Park, which received approval from the City Council Planning Committee on 13/12/22 should also be noted, alongside the Nielson House development adjoining which has been implemented.

There is no reference in the scoping report to the need for a new Mobility Hub / Park and Ride on the A44 near the A4095. The new Mobility Hub is part of the wider picture to understand how this site will be made sustainable and the need for that is set out in Appendix 4 of the Local Plan Partial Review along with the other transport infrastructure requirements.

There is only one reference in the scoping report to the intention to safeguard land for a rail halt. The term rail halt is outdated, instead land for a Begbroke railway station should be identified. Safeguarding the land is a requirement of the planning policy and we expect it will be detailed in the Development Brief. Discussions with Network Rail and the County Council as Highways Authority will be needed. It is appreciated that there is no timeline for creation of the railway station at present, and development of the site is anticipated in advance of its creation. However, the EIA will need to address how the railway station will work in future with the other transport infrastructure provided on site. An additional section should be included in the transport part of the EIA to address this.

Officer's Name: Lynette Hughes

Officer's Title: Principal Planner

Date: 05/01/2023

Application no: 22/03763/SCOP

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Transport Schedule

Transport Strategy

The site is allocated in the Cherwell Local Plan Partial Review as suitable to accommodate Oxford's unmet housing need. One of the main reasons for the site's allocation is that its location enables the site to be made highly accessible by active and sustainable travel modes.

The site is located adjacent to the A44 and the infrastructure requirements highlighted in the Local Plan Appendix 4, including a Mobility Hub at Oxford Airport, enhanced bus services, and high-quality pedestrian and cycle links to nearby communities as well as toward Oxford city, indicate how it is envisaged that the site will be made sustainable and accessible by non-car transport modes.

The Local Plan Partial Review also outlines that large-scale vehicle capacity enhancements on the local highway network are neither likely to be feasible nor desirable. Therefore, in order for the Partial Review developments to be accommodated significant interventions will be required to drive down the private vehicle mode share. However, localised mitigation schemes may still be required where specific direct development impacts are identified and are likely to be significant and / or cause delays to public transport services.

Transport Modelling

Transport Assessments will be required to clearly demonstrate that they have followed the 'Decide and Provide' approach adopted by OCC, prioritising sustainable transport and seeking, through design, to minimise private vehicle car trip generation. Transport Assessments will need to clearly justify any instances where the methodology within the TA differs from that set out within OCC's adopted Decide and Provide paper and demonstrate that any differing approaches are appropriate and achieve the same objectives.

The transport evidence base as part of the Partial Review identified a package of mitigation required to bring forward the Partial Review sites and is set out in Appendix 4 of the Local Plan. The transport evidence base identified this mitigation through strategic modelling. However, further modelling work is required at a local level to identify the final package of measures to bring forward each Partial Review site and to give the County Council confidence that the package of measures set out in Appendix 4 is sufficient to support this growth.

The North Oxford VISSIM model is to be used by the PR sites in order to test and demonstrate the impact of each development, individually and cumulatively, on the highway network and demonstrate that identified mitigation measures are appropriate and that severe impacts can be mitigated against.

Phasing of infrastructure needs to be identified to ensure that residents of the Partial Review sites can travel to and from the site by foot, cycle and public transport and not be dependent on the private car.

Environmental Statement Transport Chapter

The EIA scoping report identifies the impacts to be assessed arising from the completed development as well as those from the cumulative development of the wider PR development sites. I agree with the list of likely potential significant transport and access related effects 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.

Construction

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.

Access

The northern vehicular site access from the A44 is to be taken from the existing Begbroke Hill signalised junction. Enhanced crossing facilities and connections with

new infrastructure for pedestrians and cyclists will be required. These must meet LTN 1/20 requirements. Access to the PR9 site on the western side of the A44 is also to be taken via a new fourth arm of the junction. Capacity assessments of that site access will need to take account of the demand and phasing of the PR9 site.

The southern site access onto the A44 is to be provided to the south of the Shell petrol filling station. The location of the southern site access is the most suitable taking into account the routing of the spine road / bus service through the development site as well as its most suitable location on the A44.

Detailed plans for all access points will be required to demonstrate a safe and suitable layout as well as appropriate tie-in with pedestrian, cycle and bus priority measures.

Within the development site a network of pedestrian and cycle routes will be identified along with additional pedestrian and cycle access points to the A44. Additional signalised pedestrian crossings over the A44 will be required to enable east - west connections. One such crossing has been identified in the PR9 site application which provides a direct pedestrian / cycle route from the PR9 site towards PR8 and for onward connections to the east. This is located at the very southern end of where the allotments are currently located on the PR8 site. Accordingly, a pedestrian and cycle access between the site and this A44 crossing will be required.

Planning for pedestrian and cycle routes must have regard for the Kidlington LCWIP.

The transport assessment for the Local Plan Partial Review is based on closing Sandy Lane to through traffic. This is also a policy requirement for the PR8 site. Policy PR8 specifies that the Sandy Lane level crossing is to be closed to vehicle traffic and that Sandy Lane is to become a sustainable travel link between Yarnton, Begbroke and Kidlington.

A new pedestrian, cycle and wheelchair accessible bridge is also required over the Oxford Canal in order to provide an active travel connection between development sites PR8 and PR7b.

Public Transport

Appendix 4 of the Local Plan Partial Review sets out the requirement for 'four buses per hour service between Oxford and Begbroke routed Land East of the A44 development site'. The County Council's current public transport strategy for the PR8/PR9 development sites is for the following:

- Improvement of the existing bus service between Woodstock and Oxford city centre to four buses per hour along A44; and
- A new route between the PR8 development site, Yarnton, Oxford Parkway and Oxford city centre or the Eastern Arc operating at up to two buses per hour.

Combined, these services will provide attractive journey options to Oxford, Oxford Parkway station and Woodstock, as well as facilitating the delivery of a Mobility Hub site in the vicinity of Oxford Airport.

OCC will expect the developer to install bus shelters, flag pole and timetable cases, cycle parking and Real Time Information displays at all stops on the development. The specification of these and location of bus stops can be agreed as the detailed layout of the masterplan progresses.

Parking and Controlled Parking Zone(s)

Oxfordshire County Council has recently adopted new 'Parking Standards for New Developments', which has specific standards and requirements for 'Edge of Oxford Sites' of which PR8 is one. I have copied the most relevant section of the adopted parking standards below. The county council would welcome a flexible approach to parking between on-plot plot and on-street parking, which could be repurposed in the future if and when demand and need for parking falls.

There are several Local Plan development sites allocated around the edge of Oxford City to support Oxford's unmet housing needs. Master planning these developments and understanding the local facilities, services, pedestrian, cycle connectivity and public transport provisions that will be available to these sites is key to setting the on-site parking provisions for these development sites. As these sites progress a design approach focused on promoting active and sustainable transport planning initiatives will be required, to support OCC's target, to reduce car trips by 2040. With consideration to Oxford City's parking standards and to accord with the 'National Policy Context' of setting parking standards, Table 3 is provided to support the progress of these sites and any future speculative housing proposals located around the edge of the city's boundary.

For phases of a development that will be located within 400m of frequent (15 to 30 minute) public transport services with direct pedestrian and cycle connections, and within 800m walking distance to a range of local amenities and services, a car free approach is required, or a reduced level of on-plot car parking will be accepted to Oxford City standards; subject to a robust justification. Such approaches must be supported by an approved site wide master plan, a robust travel plan (including a fixed monitoring period), high quality pedestrian and cycle infrastructure provided early in the life of the development site, including sufficient and convenient residential and visitor cycle parking to influence travel behaviour away from using the private car.

The introduction and implementation of a CPZ, funded by the promoter of the site will also be required.

Table 3: Edge of Oxford City Sites Car Parking Standards

| Development Type | Parking Provision |
|--|---|
| 1-2 bedroom dwellings | Up to 1 space per dwelling to be provided within the development site. |
| 3-bedroom dwelling | Up to 2 spaces per dwelling to be provided within the development site |
| 4+ bedroom dwelling | Up to 2 spaces per dwelling to be provided within the development site. |
| Wheelchair accessible or adaptable houses and flats. | 1 space per dwelling to be provided within the curtilage of the dwelling (must be designed in accordance with Part M of Building Regulations) |
| Student accommodation | 0 spaces per resident room. Operational parking and disabled parking to be considered on a case-by-case. |
| Motorcycle and powered two-wheeler parking | 1 space per five dwellings. |

Flats and apartments will generally be treated as standard dwellings. However, when using land efficiently to provide residential dwellings, the parking arrangement for flats / apartments tend to be designed within a parking court / communal style arrangement. In such cases it is strongly recommended that they are controlled by a third-party organisation i.e. a management company on behalf of those who will use the spaces. This approach allows flexibility in specific spaces being allocated to a property, assigning them to a particular group or promoting such spaces as unallocated in appropriate locations.

For employment and commercial uses the adopted Parking Standards set out that parking should be determined on individual sites' merits, taking account of the site's location, access to public transport, the need to promote the use of sustainable travel, agreed trip rates, specific user groups, location, risk of displaces parking etc. Maximum standards are set out in Table 5 of the Parking Standards, however, as set out, each site will need to evidence and justify its parking requirements. Please review the Parking Standards document for full guidance.

Parking for the school sites is dealt with separately through our school design standards.

Electric Vehicle Charging Infrastructure

Policy EVI 8 of Oxfordshire's Electrical Vehicle Infrastructure Strategy (adopted March 2021 Oxfordshire Electric Vehicle Infrastructure Strategy) and Policy 29 of the adopted LTCP requires the provision of electrical charging points at homes, workplaces, and key destinations.

For all residential developments, active (live) on-plot charging points for electric vehicles and e-bicycles are to be provided. Off-plot residential car parking provisions i.e. a privately maintained parking area is to be provided with at least 25% (with a minimum of two) active charging points for all parking spaces. Such infrastructure is to be provided in accordance with the Autonomous and Electric Vehicles Act (2018), Building Regulations Document S, and the government's ambitions on 'Smart EV Charging'.

'Active' charging points for electric vehicles for new non-residential development proposals are to be provided at a minimum level of 25% for all parking spaces with ducting provided at all remaining spaces to 'future proof' such spaces to be upgraded in the future.

Car Clubs

Promoting a site wide car club is an innovative concept OCC encourages. Car clubs can be provided on-site, and alongside other initiatives, to reduce car ownership levels and parking levels.

Developers are expected to work with OCC and the local planning authority to bring forward such parking solutions into areas of public realms as part of a master planning process. This may involve dedicated on-street car parking spaces being allocated on the carriageway or being provided within local community facilities, such as local shopping centre, public car park, church, or leisure centre. Electrical vehicle charging infrastructure should be provided in such locations; subject to appropriate licences and maintenance agreements with OCC for such equipment being placed within the public highway.

Cycle Parking

Cycle parking must be provided at the levels set out in the recently adopted Parking Standards.

For residential uses, cycle parking must be secure, covered and conveniently located for easy, level access to the street.

For employment uses, Sheffield stands should be used and, for staff must be secure and covered. Cycle parking stores are to be provided close to the main entrances of buildings, be easily accessible and well overlooked. Short-stay visitor parking would also be required in conveniently locations however this does not need to be covered. Shower and locker facilities should be provided for within the employment area.

Within the Local Centre, on-street visitor cycle parking should be provided at convenient locations. This should be planned with the street design rather than attempting to retrofit such facilities once the street layout has been set. Cycle parking for various

individual uses within the Local Centre (e.g. cafes, convenience stores etc.) and schools will be required in line with the Parking Standards.

With all areas of cycle parking, consideration must be given to the needs of larger bikes, such as cargo bikes and e-bikes.

Travel Plan

A Framework Travel Plan will be required for the expansion to the Begbroke Science Park and any additional employment within the site. Individual Travel Plans will be required for any units within the employment area that exceed the Travel Plan threshold. These will be required to be updated once individual occupiers are known and must tie in with the measures and objectives set out in the Framework Travel Plan.

An overarching Travel Plan will also be required for the residential development on the site. This must include Travel Information Packs for future residents.

School Travel Plans will be required for each of the schools on the site.

OCC will be required to monitor the outcomes of the agreed measures and ensure that action is taken should agreed outputs not be met.

Public Rights of Way

The County Council maintains and protects the public right of way network and seeks to improve and extend these paths and their corridors inside and outside of strategic sites to meet current and future needs as well as providing natural infrastructure benefits.

Officer's Name: Tim Peart

Officer's Title: Senior Transport Planner

Date: 10/01/2023

Application no: 22/03763/SCOP

Location: Begbroke Science Park, Begbroke Hill, Begbroke, Kidlington, OX5 1PF

Lead Local Flood Authority

Recommendation:

Comments

Detailed comments:

Section 13.26 lists regulation and guidance which will be considered in the preparation of FRA. However, there's is no mention of our 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. Therefore, we ask that the following Pro-Forma is completed and returned as soon as possible:

Drainage Pro-Forma

Officer's Name: Kabier Salam

Officer's Title: LLFA Engineer

Date: 05/01/2023

Application no: 22/03763/SCOP

Location: Begbroke Science Park, Begbroke Hill, Begbroke, Kidlington, OX5 1PF

Education Comments

Oxfordshire County Council has a statutory duty under S14 of the Education Act 1996 to secure sufficient school places to meet the needs of local population, including as a result of housing developments such as this proposal. Under Section 7 of the Childcare Act 2006 and extended by the Childcare Act 2016, the Council has a responsibility to ensure that there is sufficient childcare and early education provision. The proposed development will have a significant impact on demand for pre-school, primary and secondary education – this includes on demand for special education places across all sectors.

The county council, in its role as strategic commissioner of school places, will advise on school planning requirements, and the resulting need for developer contributions towards school capacity. This will be based on the county council's established and tested PopCal methodology. The average pupil generation in the CDC SPD can only be an estimate, as it takes a snapshot, while the PopCal is a dynamic model which takes into account housing mix and delivery trajectory. The county council can run PopCal analyses for different housing scenarios on request.

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.

Officer's Name: Louise Heavey

Officer's Title: Access to Learning Information Analyst

Date: 05/01/2023

Application no: 22/03763/SCOP

Location: Begbroke Science Park, Begbroke Hill, Begbroke, Kidlington, OX5 1PF

Archaeology

Detailed comments:

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.

Officer's Name: Victoria Green

Officer's Title: Planning Archaeologist

Date: 10/01/2023

Application no: 22/03763/SCOP

Location: Begbroke Science Park, Begbroke Hill, Begbroke, Kidlington, OX5 1PF

Landscape / Green Infrastructure

Comments

The District Council Landscape Officer should be consulted on the application.

Officer's Name: Haidrun Breith

Officer's Title: Landscape Specialist

Date: 30/12/2022

Application No: 22/03763/SCOP

Location: PR8 Begbroke EIA scoping

Waste Strategy

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.

The development will increase domestic waste arisings and the demand for all waste management services including Household Waste Recycling Centres (HWRCs), therefore the county council will look to seek S106 contributions towards these centres.

Officer's Name: Rachel Burns

Officer's Title: Waste Strategy Manager

Date: 06/01/2023

Application No: 22/03763/SCOP

Location: PR8 Begbroke EIA scoping

Property - Schools

General

Reference should be made to compliance with OCC's process and guidance for the delivery of school sites. In particular, the following documents:

- Info and Process to assess the suitability of a school site
- Education Site Checklist
- Design Criteria for Primary School sites
- Design Criteria for Secondary School sites

The size of the schools required on the PR8 site has been informed by the Local Plan. Schools should be located at the heart of the communities they serve to enable easy and sustainable access. The Secondary school site, which is to serve a wider area, not just PR8, should be located centrally within the PR8 development site.

Item 2.29 – 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.

Item 3.3 – building heights of up to 6 storeys are not acceptable adjacent to the school sites due to potential over shadowing / overlooking and impact on building performance and usable areas of the school site. No shading from proposed adjacent buildings shall be permitted. For clarity, no building shall be located higher than the 25degree angle taken from the school boundary. School locations therefore need careful consideration within the proposed parameter plans for the development zones to ensure over shadowing is avoided. Further guidance can be found in the Design Criteria for Primary and Secondary Schools.

Figure 3.1 – Illustrative Masterplan layout – the shown location for the Secondary School adjacent to the railway line is not acceptable. The location of the first primary school in a central location is in principle acceptable. The location of a second primary school is not evident in the illustration and should be shown.

Item 3.10 – location of the schools needs to be taken in to account in the construction phasing plan to ensure schools are able to be delivered in time to meet the education needs of the development.

Item 4.2 – 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.

Item 4.23 – education sites should also be included as sensitive receptor areas as they will be occupied in the early phases of the development.

Item 8 – Noise and vibration. 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.

Item 8.13 – 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.

Item 12.2 – Ground Conditions – 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.

Officer's Name: Deborah Wyatt

Officer's Title: Strategic Liaison Manager

Date: 04/01/2023