

Our ref: Q100411/rf/eb
Your ref: 21/02286/F
Email: emma.bilton@quod.com
Date: 14 September 2021



Rebekah Morgan
Development Management
Place & Growth Directorate
Cherwell District Council
Bodicote House
Banbury
OX15 4AA

By Email

Dear Rebekah,

Proposed Drive-Thru: Land to the North West of Launton Road Roundabout (ref 21/02286/F)

I write in response to our recent email correspondence and discussions in order to address some of the comments arising from consultation feedback received so far, including from the following parties:

- Conservation Officer
- Health Protection & Compliance Officer
- Environmental Protection Officer
- Bicester Bike User Group
- CPRE Oxfordshire
- Bicester Town Council
- Launton Parish Council
- Oxfordshire County Council (OCC)
- Environment Agency

In addition to these formal responses, we have also received a number of third party comments from local residents of Bicester. We are still awaiting key consultation responses relating to planning policy.

No objections and/or requests for further clarification have been received from the Conservation Officer, Health Protection & Compliance Officer or Environmental Protection Officer, with the latter satisfied with the methodology and conclusions presented in the Noise Assessment; this is important to note in light of some of the other responses.

No objections have been received from OCC Transport Development Control or Archaeology, although some further responses to comments made are outlined below, and we will issue separate



responses on some of the more detailed points. Similarly, a separate response will be issued in relation to the objection from the Environment Agency. We are seeking to clarify some of the comments received from the Lead Local Flood Authority which do not appear to reflect or respond to the content of the application submission in terms of flood risk and drainage.

The headings below relate to the key matters/themes which have been raised to date.

Site Allocation

The site is subject to an up to date development plan allocation in the Cherwell Local Plan (adopted 2015). The allocation was subject to scrutiny and sustainability testing through the consultation and examination process. It is clear that the site was always going to be developed (as part of a wider comprehensive form of development), and there will be no loss of designated amenity greenspace.

Furthermore, the application site (and adjoining land now accommodating the care home) has previously been subject to permission for development with far greater site coverage than the existing proposal (**Figure 1.1**). This comprised an office development of 9 units (c.5,850 sqm) granted in May 2011 (ref 09/01659/REM). A significant proportion of this permitted development was to be accommodated on the current application site.

Figure 1.1: Approved Reserved Matters Layout

— Approximate boundary for the proposed development





Although the current red line application boundary (1.16ha) extends across the entirety of the undeveloped area, the main form of development is limited to a small proportion of the site. Through engagement with the Environment Agency and extensive flood modelling only 0.28 ha of the site (i.e. the developable site area) is to be developed. This allows the remainder of the site (0.88 ha / c.75%) to be set aside for flood risk mitigation, with corresponding amenity and ecological benefits.

The proposed development will deliver on the job creation objectives of the allocation; through both direct job creation, and by making existing local jobs more attractive through the introduction of a new amenity.

It is difficult to envisage another form of development being delivered in this location with comparable levels of employment generation, whilst also fully mitigating flood risk and enhancing the biodiversity of the site and retaining 75% of the amenity space.

Highways and Accessibility

Pedestrian and Cycle Accessibility and Priority

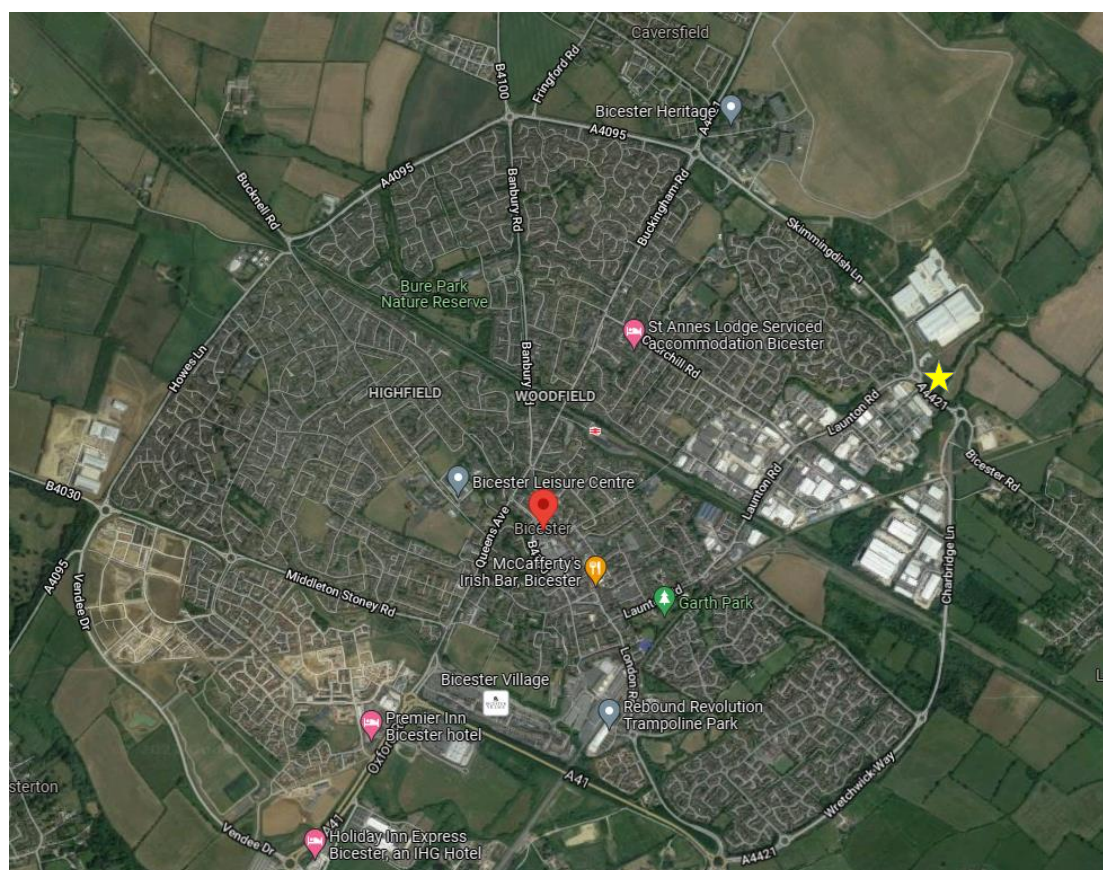
Pedestrian (and cycle) infrastructure in the vicinity of the site is generally very good as highlighted within the Transport Statement. There are uncontrolled pedestrian crossings provided on all four arms of the Launton Road Roundabout and footways on both sides of the A4421, including a cycleway/footway which runs along the western side of the A4421.

The site access will be provided with a footway on its western side which will tie in with the existing footway network on the roundabout, providing suitable connections to access the site on foot or bicycle. These arrangements could be refined (including internal arrangements regarding storage, for example) in conjunction with the LPA and OCC, and the applicants are keen to make further enhancements where possible and justified. We will be in contact separately to agree what improvements can be made.

The anticipated customer base for the new unit is a relevant consideration within this context. Customers will primarily be drawn from two scenarios; pass-by trips by car (i.e. trips already on the network – up to 90% of trips), or the significant and growing local business population to the north and south (**Figure 1.2**). It is envisaged that many of these local services trips will be undertaken on foot, with experience from other comparable facilities suggesting that cycle usage will be more limited.



Figure 1.2 – Surrounding Context



★ The site

Vehicular Congestion

First of all we welcome confirmation from OCC Highways that they have no objection to the proposed development. This provides a sound technical response to some of the more general comments which have been made regarding perceived traffic and congestion issues.

The response supports the conclusions of the Transport Statement which demonstrates that the increase in traffic generated on the local highway network would be negligible.

Indeed, the likelihood is that the proposal will reduce the propensity for people to travel further by car from the industrial and business area to access similar facilities elsewhere which can only be beneficial in terms of congestion and overall sustainability.

It is also relevant to note that the development includes ample customer seating (indoors and out) to encourage a more balanced pattern of trips, rather than simply being a drive-thru facility with a singular focus on car borne trips.



Climate Change and Sustainability

Policy Bicester 11 requires consideration of climate change mitigation and adaption measures, including demonstration of compliance with Policies ESD 1 – 5, where feasible.

It should be noted that Policy Bicester 11 is founded on the expectation of a comprehensive large scale employment scheme being delivered across an area of 15ha. However, the proposals only occupy a residual developable area of 0.28ha. It is not possible to feasibly reflect the wider objectives for the allocation on such a limited scale of development (less than 2% of the allocation area).

Nevertheless, the applicant and the operator are alive to the national climate change emergency, and the Council's environmental policies, and are proposing a range of measures to mitigate the climate change impacts of development wherever feasible. These measures include:

- Increased surface water attenuation and flood storage is proposed on site which will slow the rate of water entering the drainage network and therefore reduce the risk of flooding and the impact on the natural environment.
- Accommodating electric vehicles and cycle usage by customers and staff.
- Connecting with the existing footway network (as set out above) which encourages sustainable travel options including walking, cycling and public transport.
- Delivery of a biodiversity net gain on site.
- Use of air source heat pumps at fit out stage as a source of renewable energy.

It is acknowledged that the suite of climate change and sustainability policies also include reference to BREEAM accreditation. Again, the applicants have explored the opportunities around BREEAM, but in common with other similar developments across the local area (and nationwide) it is simply not feasible to secure the required number of credits.

There are many reasons for this, not least the fact that the applicants can only control construction to building shell and not fit out (responsibility of the occupier) where many of the credits lie (e.g. daylighting, energy performance, etc.), and the limited scale of the building and developable area which reduces the scope to incorporate measures to boost credits.

More corporately Greggs are taking a lead on climate changes mitigation, including the following:

- In 2019 they removed 350 tonnes of single use plastics from their operations.
- By 2025 they will be using 25% less packaging than in 2019.
- By 2025 they will be using 100% renewable energy in their operations.
- They will be a net zero carbon organisation by 2040, some 10 years ahead of the Government's Target.



- They redistribute nearly 20% of unsold food to charities and community groups.

Green Space and Ecology

As set out above, the main form of development is limited to a small proportion of the site (0.28ha). The remainder of the site 75% (0.88ha) will remain undeveloped with scope to maximise its amenity and ecological value.

Comprehensive ecological surveys have been undertaken which have informed the Preliminary Ecological Assessment ("PEA"). The PEA concludes that the grassland and scrub on site is in poor to moderate condition and the Biodiversity Assessment identifies that the proposals will result in a net gain through the introduction of enhanced value and managed soft landscape features. Again, there could be scope to further enhance this value in conjunction with the proposed development, or to consider greater accessibility by links to the PROW network.

The proposals represent a net benefit in terms of green space and ecology when compared with the comprehensive approach to development previously approved, and the development plan allocation.

Relationship with Wyndham Hall Care Home

The relationship with the care home has been a key factor influencing the proposals. The Applicants have engaged and considered with the owners of the care home site throughout the design process. No objection has been received from the care home linked to this engagement, and reflects the synergy of the proposals with the wider commercial engagement.

As noted within the Planning Statement the south eastern frontage to the care home is where the main area of development and operational activity is focussed, with the resident gardens and non-active frontages focussed on the opposite north-western elevation (having a relationship with Skimmingdish Lane and the Link9 development).

The Noise Assessment identifies the care home as the closest noise sensitive receptor and assesses noise arising from fixed plant equipment, drive-thru activity and car parking. It concludes that the operation of the unit and drive-thru would not adversely affect the amenity of existing residents and this conclusion has been supported by the Council's Environmental Protection officer.

Vitality and Viability of Bicester Town Centre

As referenced above, the proposal will serve a different market/customer base to the alternative facilities available within the town centre; i.e. local businesses or pass-by trips on the highway network. There is no competition with the town centre.

The Greggs food and beverage offer is evolving to include a wide range of healthier eating options, but this is to enhance the offer (and social responsibility) to existing customers rather than to compete with a wider range of operators who may already be trading from the town centre, for example.



The drive-thru nature of this particular outlet only serves to reinforce that conclusion. As highlighted within the Planning Statement, although identified as a main town centre use, drive-thru units are not easily accommodated within town centres due to the space requirements of the drive-thru infrastructure.

A thorough desk top assessment has been undertaken of all realistic opportunities within, or on the edge of Bicester town centre. Having adopted a flexible approach it is concluded that there are no sequentially preferable units or sites in, or on the edge of, Bicester town centre that are capable of accommodating the proposed development. It is not something that can be replicated with a vacant shop unit.

Archaeology

The requirement to undertake further phased investigation is noted, and it is understood that this will be conditioned on the grant of planning permission. It is considered that the submitted assessment represents a robust basis against which to grant permission and secure these further investigations at the appropriate time.

Health and Wellbeing

We note various comments on the application reflecting a misconception around the proposals seeking permission for a 'fast food' restaurant, and corresponding concerns regarding the health impacts of such a scheme.

The Greggs offer is categorically not that of a 'fast food' outlet. Furthermore, Greggs have made significant progress in diversifying their food offering and wider contribution to health and wellbeing initiatives over recent years. These initiatives are perhaps best summed up through reference to a summary of commitments from The Greggs Foundation:

Community

Greggs Breakfast clubs provide 40,000 + children a free breakfast in over 600 schools across the country, providing children with a nutritious start to their day.

The Greggs hardship fund provide grants for white goods, beds, bedding, shopping & clothing vouchers for those in financial need.

Gregg's support the Every Mind Matters campaign.

In 2019 Greggs donated food to provide 500,000 meals to people in need. By 2025, Greggs expect to double that to 1 million meals.

Healthy Eating

Greggs have launched a Balanced Choice range – all at under 400 calories and no red traffic light items.



Salt has been reduced in all of their most popular products and there is no added sugar in their low-calorie carbonated drinks.

There has been a 23% calorie reduction in the food range since 2016. With an average of 400 calories per product, Greggs already comply with the Public Health England maximum for savouries.

Vegan versions of their best selling products have been introduced to reduce meat consumption.

Greggs display calorie content and nutrition content as well as a traffic light system on all products.

Summary

We trust that the enclosed is helpful for the time being and look forward to having the opportunity to discuss these matters in further detail shortly.

Key points to note in addressing the themes to raise from consultation feedback to date include:

- The proposals represent sustainable use of land allocated for development, and subject to previous permissions for development.
- The proposals will safeguard a greater proportion of undeveloped land than has previously been envisaged.
- This will benefit flood risk mitigation, ecology/biodiversity, and general amenity.
- The proposal will serve a very specific market/customer base focussed on pass-by trips and the extensive (and growing) local business population.
- Therefore, it will not be a significant trip generator (again, the site has long been allocated for development), or competitor with town centre businesses.
- Indeed, the proposal should reduce longer vehicle trips to more distant comparable destinations, whilst retaining expenditure within the town, as well as assisting local businesses by broadening the local services offers.
- All of the above points contribute to the overall sustainability of the proposed development and the scope to mitigate climate change. A scheme of this limited scale cannot feasibly comply with the various climate change policy objectives in its own right, but in combination with the corporate approach adopted by Greggs and the range of measures incorporated with the scheme (with scope for further enhancement) it is clear that these matters have been at the forefront of the scheme design.

In the meantime, please do not hesitate to contact us should you have any queries.



Yours sincerely

EOBilton

Emma Bilton
Planner