

Appendix B – Statement of Conformity Reviews





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Our Ref: RDV/ecy

18<sup>th</sup> April 2023

Carney Sweeney  
Crossway  
156 Great Charles Street Queensway  
Birmingham  
B3 3HN

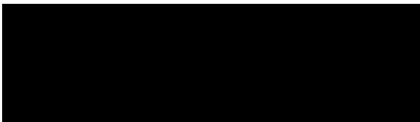
Dear Mr Sweeney

**Proposed Section 73 Application to Vary Condition 4 of Outline Planning Consent 17/02534/OUT – ES Chapter 6**

With regards to the Section 73 Application referenced above, relating to a change in the overall height of the buildings, which will form part of the development. We have reviewed the Environmental Statement which was included in the original outline planning consent (titled “Bicester Office Park, Environmental Impact Assessment Volume 1: Environmental Statement” dated December 2017), specifically the chapters which are relevant to our services on the development – “Chapter 6 Socio-Economics”.

We can confirm that we do not consider the change in building height to have any impact on the content and conclusions of Chapter 6 Socio-Economics, which formed part of the original Environmental Statement.

Yours sincerely



Richard Venables MRICS  
**Senior Director**  
**For and on Behalf of CBRE Ltd**

Carney Sweeney  
Crossway  
156 Great Charles Street Queensway  
Birmingham  
B3 3HN  
FAO Mr G Sweeney

Our Ref: VE/ITM17090  
Date: 20 April 2023

By E-mail only

Dear Ged

## **Proposed Section 73 Application to Vary Condition 4 of Outline Planning Consent 17/02534/OUT – Chapter 7: Transport and Access**

We refer to the above outline planning consent relating to the Bicester Office Park, located adjacent to A41 Oxford Road, Bicester. A Section 73 application is being submitted by Peveril Securities Ltd and Sladen Estates Ltd which seeks to vary Condition 4 of the outline consent which referred to a series of approved plans, tables and drawings. In particular, the Section 73 application seeks to amend:

- Drawing 1105\_P\_005 Rev E (Parameters Plan), substituting this with Drawing 05935-5PA-MP-00-DR-A-9010 (Parameters Plan); and
- Table 4.1 of the EIA dated December 2017 (prepared by Trium) which set out the maximum building heights proposed for each plot across the site.

It is noted from the information supplied by Sladen Estates (by email dated 27 March 2023) that the Section 73 application will include the submission of a revised parameters plan and associated table, and seeks consent for taller maximum building heights and higher levels above Ordnance datum. It is also noted that the overall proposed floor area is not changed.

We have reviewed the Environmental Statement (ES) submitted in support of the above outline application, in particular Chapter 7 – Transport & Access, which considered the potential environmental effects of the proposed development in relation to traffic, transport and access matters, with reference to the proposed changes being sought as part of the current Section 73 application.

We confirm that as the proposed changes to the parameters plan and building heights will not affect the overall development quantum proposed across the Bicester Office Park site, the conclusions of Chapter 7 of the ES remain valid, in so far as the proposed development is expected to have a negligible residual effect upon the surrounding transport and highway networks, once the proposed mitigation measures have been taken into account.

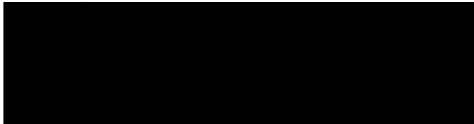
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It is therefore concluded that the contents and conclusions of Chapter 7 of the original ES, and the Transport Assessment that was attached as Appendix 7.1 of the ES can be relied upon to support of the proposed Section 73 application, to demonstrate that the residual effects of the development will be negligible in transport terms.

If you require any further clarification on the above, please don't hesitate to contact me.

Kind regards,

Yours sincerely



**VANESSA EGGLESTON**

Partner

for i-Transport LLP

Email: [vanessa.eggleston@i-transport.co.uk](mailto:vanessa.eggleston@i-transport.co.uk)

**80083-SRL-RP-CO-YA-S2-P1**

19 April 2023

Carney Sweeney  
Crossway  
156 Great Charles Street  
Queensway  
Birmingham  
B3 3HN

Dear Mr Sweeney

**RE Proposed Section 73 Application to vary condition 4 of Outline Planning Consent  
17/02534/OUT - ES Chapter 8**

SRL have been engaged as Acoustic Consultants by Peveril Securities in relation to the Bicester Arc development.

The Section 73 Application referenced above seeks permission for a change in the overall height of the buildings which will form part of the development. We have reviewed the Environmental Statement which was included in the original outline planning consent (titled "Bicester Office Park, Environmental Impact Assessment Volume 1: Environmental Statement" dated December 2017), specifically the chapters which are relevant to our services on the development going forward - "Noise & Vibration".

We can confirm that the change in building height will not have any impact on the content and conclusions of Chapter 8, which formed part of the original Environmental Statement. No changes to any noise or vibration impacts are expected if condition 4 is varied as proposed.

Yours faithfully,

**Matt Coll**

For and on behalf of  
SRL Technical Services Limited  
Tel: 01787 247595  
Email: [mcoll@srltsl.com](mailto:mcoll@srltsl.com)

Steve James  
Sladen Estates  
Maisie House  
8 Maisies Way  
South Normanton  
Derbyshire  
DE55 2DS

29th March 2023

### **Bicester Arc Section 73 Planning Application – Air Quality**

This letter provides a review of the implications of the proposed design changes to the consented Bicester Arc office development (outline planning consent ref: 17/02534/OUT) in relation to the conclusions of the air quality assessment set out within the Environmental Statement (ES) submitted in support of the original planning application in 2018.

The air quality assessment considered the impacts of emissions from road traffic generated by the consented development on local air quality, and the impacts of dust and fine particulate emissions during construction works. The 2018 ES concludes that the air quality impacts of road traffic generated by the consented development are not significant and there is no need for specific mitigation. The impacts of dust and fine particulate during construction were found to be not significant provided good practice control measures are employed during the works.

The proposed Section 73 application is to vary the heights set within the approved parameter plans, but will not alter the overall development floor areas compared to the existing outline planning consent.

The project transport consultants, iTransport, have confirmed that the Transport Assessment (TA) submitted with the outline application was based on the development floor area, which is not changed, and as such there is no resultant impact of the proposed height changes on the TA and therefore the data used to inform the air quality assessment.

Accordingly, there will be no change to the assessment of road traffic emissions impacts nor its conclusions as set out in the 2018 ES.

In terms of construction dust and particulate emissions, the assessment is based on the overall floor area and massing of the development and likely construction activities. The Section 73 changes do not materially change the assumptions or inputs to the construction phase assessment and therefore will not change the conclusions.

**Air Quality Consultants**  
23 Coldharbour Road, Bristol BS6 7JT

**Tel** 0117 974 1086

**Email** [aqc@aqconsultants.co.uk](mailto:aqc@aqconsultants.co.uk)

**[www.aqconsultants.co.uk](http://www.aqconsultants.co.uk)**

Overall the amendments to the consented Bicester Arc development proposed within the Section 73 application do not change the findings of the air quality assessment set out in the 2018 ES.

**Laurence Caird**  
Technical Director  
Air Quality Consultants Ltd

Your ref: Bicester Park  
Our ref: KHB  
Date: 18/04/2023

Carney Sweeney  
Crossway  
156 Great Charles Street Queensway  
Birmingham  
B3 3HN

FAO: Mr G Sweeney

Dear Mr Sweeney

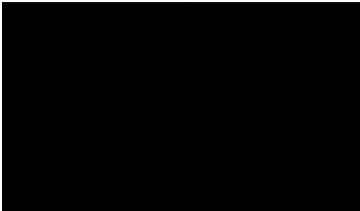
**RE Proposed Section 73 Application to vary condition 4 of Outline Planning Consent  
17/02534/OUT – ES Chapter 10.**

With regards to the Section 73 Application referenced above, relating to a change in the overall height of the buildings, which will form part of the development. We have reviewed the Environmental Statement which was included in the original outline planning consent (titled “Bicester Office Park, Environmental Impact Assessment Volume 1: Environmental Statement” dated December 2017), specifically the chapters which are relevant to our services on the development – “Built Heritage elements only of Chapter 10 Buried Heritage (Archaeology) Built Heritage”.

We can confirm that we do not consider the change in building height to have any impact on the content and conclusions of Chapter 10 Buried Heritage (Archaeology) Built Heritage with regards to the Built Heritage elements, which formed part of the original Environmental Statement.

Yours faithfully

Kate Hannelly-Brown BSc MSc IHBC





Our ref: 10048 s73 Application for Bicester Office Park

Carny Sweeney  
Crossway  
156 Great Charles Street Queensway  
Birmingham  
B3 3HN

F.A.O Mr G. Sweeney

14<sup>th</sup> April 2023

Dear Mr Sweeney

**Proposed Section 73 Application to vary condition 4 of Outline Planning Consent  
17/02534/OUT ES Chapter 11 - Ecology**

FPCR have been engaged as ecology consultants by Peveril Securities in relation to the Bicester Arc development.

With regards to the Section 73 Application referenced above, this relates to a change in the overall height of the buildings, which will form part of the development. We have reviewed the Environmental Statement which was included in the original outline planning consent (titled "Bicester Office Park, Environmental Impact Assessment Volume 1: Environmental Statement" dated December 2017), specifically the chapters which are relevant to our services on the development going forward: "Chapter 11 - Ecology".

We can confirm that we do not consider the change in building height to have any impact on the content and conclusions of Chapter 11, which formed part of the original Environmental Statement.

Yours faithfully

**Vicky Fletcher**  
Principal Ecologist  
FPCR Environment and Design Ltd

[vitoria.fletcher@fpcr.co.uk](mailto:vitoria.fletcher@fpcr.co.uk)

masterplanning ■  
environmental assessment ■  
landscape design ■  
urban design ■  
ecology ■  
architecture ■  
arboriculture ■  
graphic design ■

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Aizlewoods Mill, Nursery Street, Sheffield S3 8GG

## LANDSCAPE AND VISUAL IMPACT

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### Scope of work

Following the proposed alterations to the parameters plan approved under application 17/02534/OUT, we have reviewed the landscape and visual chapter of the submitted Environmental Statement (ES) by Trium (December 2017) to establish if new significant adverse effects would arise from the proposed development.

The parameter plan (Figure 1) illustrates the amended developable areas, which are considered against the consented outline application 17/02534/OUT (Figure 2). The maximum development height for each zone is also amended as illustrated in Table 1. Overall, the new proposal adds between circa 2m and 5.5m AOD to the approved outline application.

*Table 1 - Proposed heights*

	<b>Proposed Building Height</b>	<b>Proposed Max Height AOD</b>
Zone A	21.00	87.80
Zone B (Previously Zones B & C under 17/02534/OUT)	21.00	88.75
Zone D	21.00	87.40
Zone E	21.00	87.50
Zone F	21.00	87.80

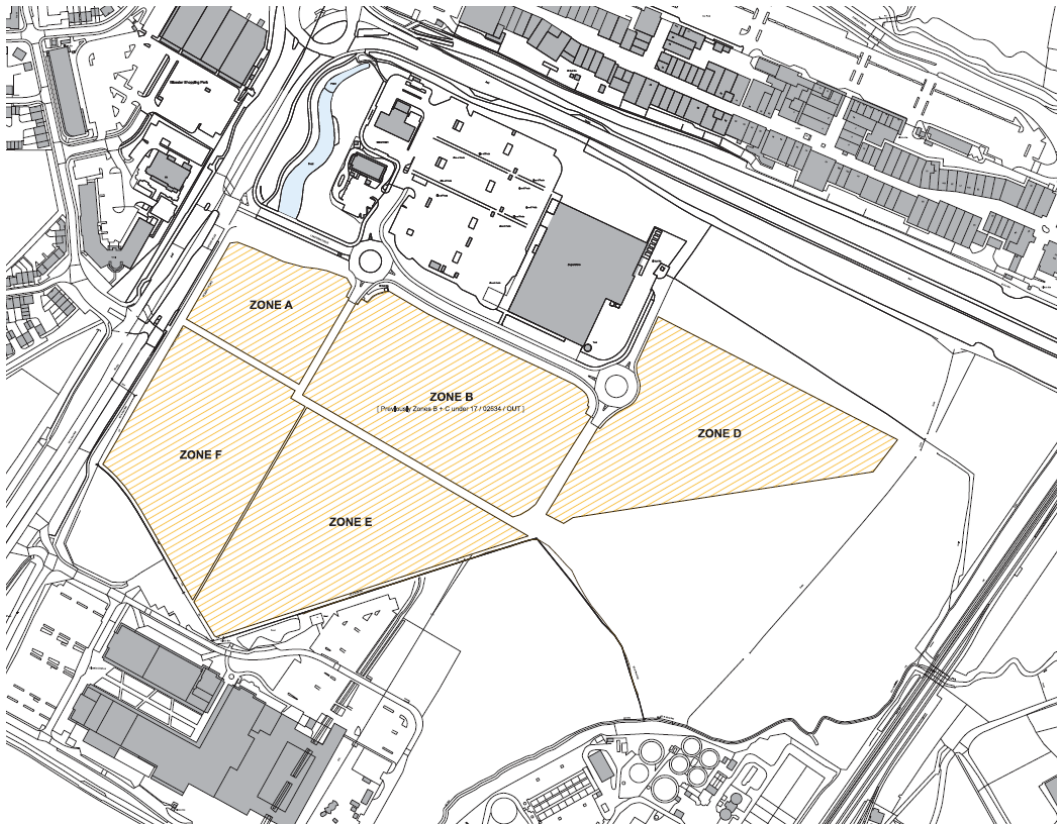


Figure 1 - Amended parameter plan

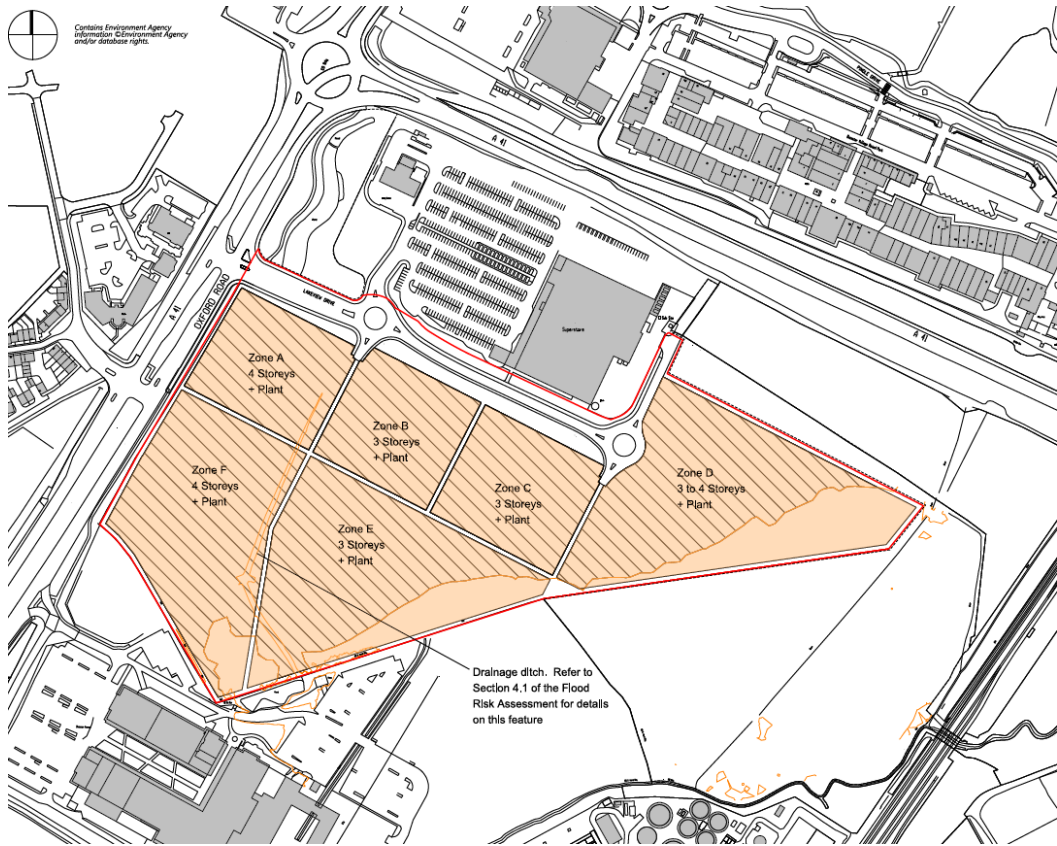


Figure 2 - 17/02534/OUT parameter plan

## Review of the ES chapter

The ES landscape and visual impact chapter (LVIA) was produced by Hyland Edgar Driver Ltd.

The LVIA is structured in accordance with the relevant professional guidance (Guidelines for Landscape and Visual Impact Assessment as defined by the Landscape Institute and Institute of Environmental Management & Assessment).

It is noted that the LVIA does not refer to the most recent guidance on landscape value (TGN 02/21 Assessing landscape value outside national designations) and technical visualisations (TGN 06/19 Visual representation of development proposal) as both post-date the ES completion date. Nonetheless, the LVIA appropriately refers to and applies the current guidance of that time. It is not believed that the outcome of the assessment would have been altered by the new guidance as far as landscape value is concerned.

In regards to the technical visualisations, the ES only included baseline panoramas but no photomontages. The conclusions on the visual impact are considered fair and professional; however, to inform the assessment of the new parameters, Type 4 AVR 0/1 technical visualisations have been produced in accordance with TGN 06/19.

Overall, the LVIA follows best practices: it provides clear evidence of each stage of the assessment process and it appears to be undertaken with professional integrity. Although we have not undertaken our own assessment, it is believed that the findings and conclusions of the LVIA are reliable and led to a granted outline planning application.

The LVIA concluded that there would be no residual significant adverse effects on the landscape receptors at year 15, with a local and temporary (up to 15 years) significant adverse impact on the landscape character identified before the proposed vegetation has matured.

Similarly, on the visual impact, the LVIA concluded that the proposal would result in one temporary (up to 15 years) significant impact on the short-distance view experienced by residents (viewpoints 1-3), but this would also be mitigated by the growth of the proposed planting.

## Impact of the new proposal

The LVIA considers two separate but interlinked aspects: landscape and visual effects. It also considered the proposals' effects at three stages of the project: construction, operational and after 15 years.

In regard to the landscape effects, it is believed that the proposed changes to the parameter plan would not alter the conclusion of the LVIA. The nature of the development is unchanged and so is the expected construction activities; the extent of the developable area is also not substantially different from the one approved by 17/02534/OUT. Therefore, all impacts identified in the LVIA are considered valid for the new proposal.

The analysis of the visual effects associated with the new proposal has been informed by the production of technical visualisations (see Appendix 1). These represent the worst-case scenario as they illustrate the max height of the proposed development within each zone, assuming the built form is spread across the whole area.

The technical visualisations exclude viewpoints 4, 6, 7, 9 and 10 as intervening distance and/or new developments to the east of the site fade and/or obstruct the views. The conclusion of the LVIA on the receptors associated to these viewpoints (i.e. no significant effects) is therefore unchanged.

On the remaining viewpoints, the LVIA identified no significant effects on the medium-distance views (5,8 and 11). This would also be the case for the new proposal according to the following considerations:

- Viewpoint 5 – as shown in the technical visualisation (Appendix 1), the proposal will be partially screened by the intervening vegetation and alter the existing skyline by rising above the treed horizon. Zone F, which is at the forefront of the view, is increased by roughly 2.5m AOD from the outline application, which would have also been visible above the tree canopies, and similarly, Zone A behind it. Therefore, regardless of the increased height, the

outline application would have resulted in similar effects, and the increased height would not cause any additional impact.

- Viewpoint 8 - as shown in the technical visualisation (Appendix 1), the proposal will be largely screened by the intervening built form with limited glimpses of Zone B, D and E visible above the far distance roofline horizon. This will not cause adverse effects as the change to the composition of the view is considered too limited to alter its qualities.
- Viewpoint 11 – as shown in the technical visualisation (Appendix 1), the proposal will be visible at the centre of the view. The max height of Zone D, which is at the forefront of the view, is increased by roughly 1.5m AOD from the outline application, which would have also been visible in this view. Therefore, regardless of the increased height, the outline application would have resulted in similar effects, and the increased height would not cause any additional impact.

On the short-distance views (1,2 and 3), the LVIA identifies a significant, albeit temporary (0-15 years), effect on the receptors in the residential area, which are rightly considered more sensitive than road users and will experience a noticeable change in their visual experience. The analysis of the technical visualisation, particularly viewpoint 2, suggests that the new proposal will be equally visible as 17/02534/OUT, and the increased height will not cause additional impacts as it is still subservient to the visible residential context. In regards to the local workers and road users receptors, the change in the composition of the experienced view is noticeable regardless of the increased height, which will not cause additional impact.

Finally, it is considered that the LVIA conclusion on the cumulative effects will also remain unchanged as the additional height will not alter the relationship with the assessed consented scheme. Furthermore, the residential area to the west of the site is now under construction and partially completed; therefore the above consideration on the visual impacts are relevant to the conclusion on the cumulative effects as well.

## Conclusion

This note was prepared by a professional, chartered landscape architect with experience in landscape and visual assessment within and outside the EIA requirements. While we did not conduct a new, full assessment of the proposal, we considered the LVIA for 17/02534/OUT reliable and compared the new proposal with its findings. Furthermore, in order to formulate an informed opinion on the landscape and visual effects, technical visualisations (see Appendix 1) were produced to show the max height on each Zone of the new parameter plan.

Following a review of the LVIA findings against the new proposal, it is believed that the conclusion of ES Chapter 12 will not be altered by the amended height in the parameter plan.

# APPENDIX 1 – TECHNICAL VISUALISATIONS

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Bicester

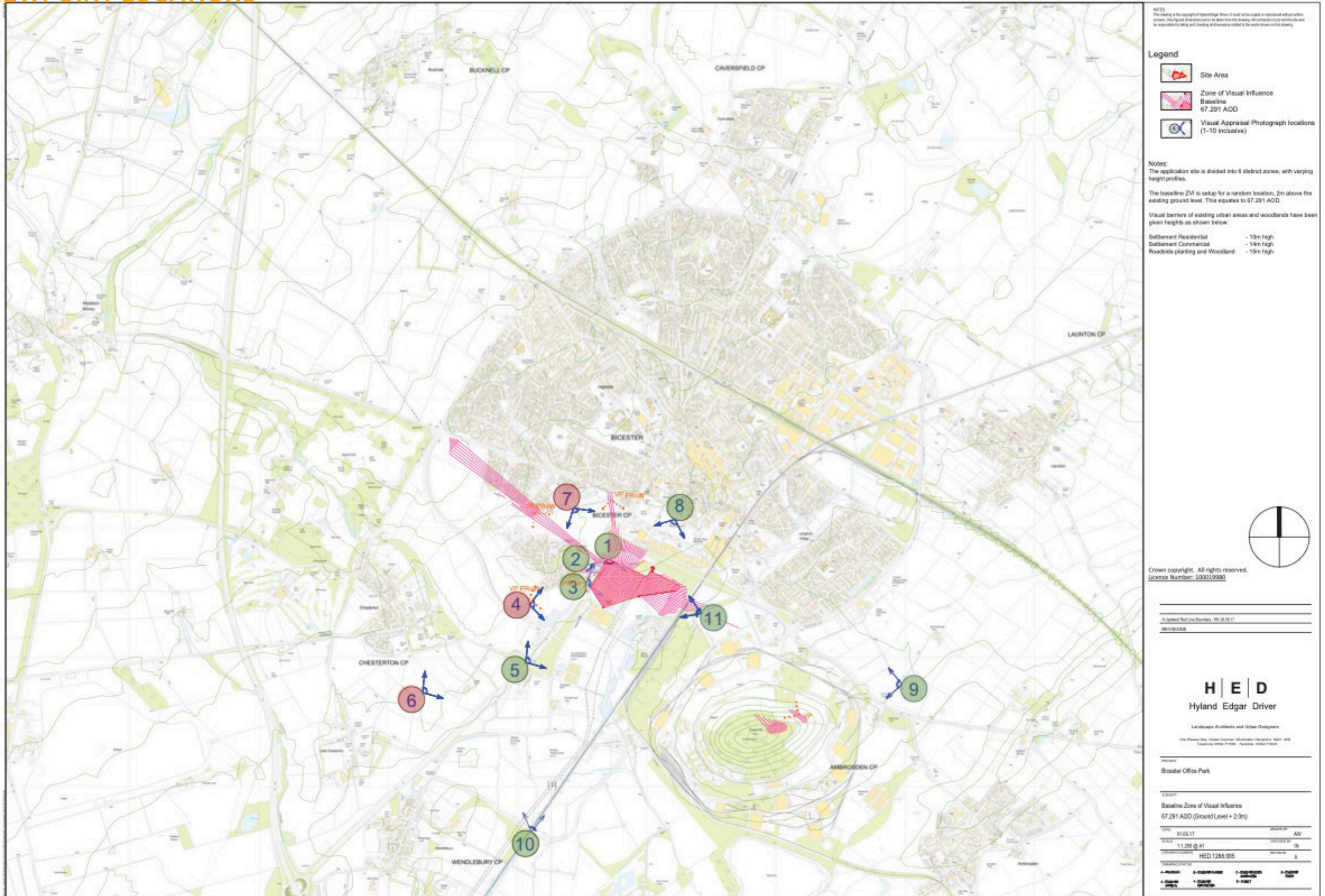
Outline Planning Application Visualisations

Sladen Estates

04 APRIL 2023

collective

# VIEWPOINT LOCATIONS





## VIEWPOINT OVERVIEW

VIEW	DESCRIPTION	TYPE	EASTING	NORTHING	ELEVATION
V01	Lakeview Drive, Looking South East	AVR 3	457708.133	221760.008	67.527
V02	Corner of Pioneer Way and Haydock Road, Looking East	AVR 3	457537.397	221700.560	67.832
V03	A41, Looking North East	AVR 3	457535.686	221584.820	67.019
V05	A41 Flyover, Looking North	AVR 3	457060.672	220964.567	73.252
V08	Bicester Village Park, Looking South	AVR 3	458273.040	222024.562	68.328
V11	Graven Hill, Looking West	AVR 3	458418.711	221352.207	66.824

### (AVR\_TYPES)

(AVR\_1 FULL RENDER COMPOSITION)

(AVR\_2 RENDER/OUTLINE COMPOSITION)

(AVR\_3 OUTLINE RENDER COMPOSITION)

ALL PHOTOGRAPHY TAKEN USING FULL FRAME NIKON 810 CAMERA, WITH A 24MM TILT & SHIFT LENS\*

ELEVATION SHOWN TAKEN USING VIEWPOINT HEIGHT ABOVE SEA LEVEL + 1.65M TO CENTRE OF LENS FROM THE FLOOR

# Representative Viewpoint 1- Lakeview Drive, Looking South East

National Grid Reference	457708.133E	221760.008N
Camera Height	69.177 m	
Focal Length	N/A	
HFOV	120	
AVR Level	AVR3	
Date	25/03/2022	
Time	11:44	

[VIEW DETAILS](#)



EXISTING



Zone Height Guide

**Representative Viewpoint 1 – Lakeview Drive, Looking South East**



**BASELINE**

# Representative Viewpoint 1 - Lakeview Drive, Looking South East



Zone Code	Proposed Max Height AOD
Zone A	87.80
Zone B	88.75
Zone D	87.40
Zone E	87.90
Zone F	87.80

## ZONE HEIGHT VISUAL

# Representative Viewpoint 2 – Corner of Pioneer Way and Haydock Road, Looking East

National Grid Reference 457537.397E      221700.560N  
 Camera Height 69.482m  
 Focal Length N/A  
 HFOV 120  
 AVR Level AVR3  
 Date 25/03/2023  
 Time 12:10

[VIEW DETAILS](#)



EXISTING



Zone Height Guide

**Representative Viewpoint 2 – Corner of Pioneer Way and Haydock Road, Looking East**



**BASELINE**

# Representative Viewpoint 2 – Corner of Pioneer Way and Haydock Road, Looking East



## ZONE HEIGHT VISUAL

# Representative Viewpoint 3 - A41, Looking North East

National Grid Reference	457535.686E	221584.820N
Camera Height	68.669m	
Focal Length	N/A	
HFOV	100	
AVR Level	AVR3	
Date	25/03/2023	
Time	12:25	<a href="#">VIEW DETAILS</a>



EXISTING



Zone Code	Proposed Max Height AOD
Zone A	87.80
Zone B	88.75
Zone D	87.40
Zone E	87.30
Zone F	87.80

Zone Height Guide



**Representative Viewpoint 3 - A41, Looking North East**



**BASELINE**

## Representative Viewpoint 3 - A41, Looking North East



### ZONE HEIGHT VISUAL

# Representative Viewpoint 5 - A41 Flyover, Looking North

National Grid Reference	457060.672E	220964.567N
Camera Height	74.902m	
Focal Length	N/A	
HFOV	105	
AVR Level	AVR3	
Date	25/03/2023	
Time	13:14	

[VIEW DETAILS](#)



EXISTING



Zone Code	Proposed Max Height AOD
Zone A	87.50
Zone B	88.75
Zone C	97.40
Zone E	87.50
Zone F	87.50

Zone Height Guide

**Representative Viewpoint 5 - A41 Flyover, Looking North**



**BASELINE**

# Representative Viewpoint 5 - A41 Flyover, Looking North



## ZONE HEIGHT VISUAL

# Representative Viewpoint 8 - Bicester Village Park, Looking South

National Grid Reference	458273.040E	222024.562N
Camera Height	69.978m	
Focal Length	N/A	
HFOV	135	
AVR Level	AVR3	
Date	25/03/2022	
Time	15:03	<a href="#">VIEW DETAILS</a>



EXISTING



Zone Code	Proposed Max Height AOD
Zone A	87.00
Zone B	88.75
Zone C	87.00
Zone E	87.50
Zone F	87.00

Zone Height Guide

## Representative Viewpoint 8 - Bicester Village Park, Looking South



**BASELINE**

# Representative Viewpoint 8 - Bicester Village Park, Looking South



## ZONE HEIGHT VISUAL



# Representative Viewpoint 11 - Graven Hill, Looking West

National Grid Reference	458418.71E	221352.207N
Camera Height	68.424m	
Focal Length	N/A	
HFOV	90	
AVR Level	AVR3	
Date	25/03/2022	
Time	14:42	<a href="#">VIEW DETAILS</a>



EXISTING



Zone Height Guide

**Representative Viewpoint 11 - Graven Hill, Looking West**



**BASELINE**

## Representative Viewpoint 11 - Graven Hill, Looking West



### ZONE HEIGHT VISUAL

## METHODOLOGY

The Verified View process follows industry standard methodologies, covering photography, 3D modelling and photomontages. These are specified by the Landscape Institute: Guidelines for Landscape and Visual Impact Assessment 3rd edition (April 2013); Landscape Institute Technical Guidance Note 06/19 (September 2019), and Visual Representation of Development Proposals; The Revised SPG London View Management Framework (March 2012.)

### Photography and Survey Data

The first step is to take what is known as a 'baseline' photo. We go to the site and take high resolution, full-frame photos from pre-selected locations. This gives us a current unaltered view of the site. For all AVR photography it is important to use a prime lens (fixed focal length) at a standard consistent focal length, one that matches the cone of human vision as closely as possible. Most often, a 50mm prime lens offers the best image quality with the lowest level of distortion.

For close up views, we would use a 24mm tilt-shift lens to capture the complete context of the scene. From further away, we would use a 50mm lens as it gives a more accurate interpretation of what the human eye would see. Throughout each site visit, records are taken of the time of day, date, and weather conditions to ensure accurate model matching later in the process.

Surveyor data is captured at the same time as the photography. The surveyors capture and log precise information of where the camera is positioned along with agreed points that will be captured within the baseline photo. These points are logged in Ordinance Survey space and a point cloud CAD is then produced to be used at the Camera Matching stage.

### Modelling

Verified Views are all about the development proposals; what the final build will look like in the real-world context. Therefore, modelling is key. It ensures that the design team's intent is properly understood and visualised. We either create models of proposals from scratch or work with anything that can be provided by the client, from hand-drawn plans to 2D AutoCAD drawings and Revit models. Using GPS topographic survey data, either gathered during the site visit or provided by the client, the model is positioned in the real-world model space occupied by the virtual cameras. Depending on the level of render and AVR classification, accurate architectural details are modelled onto the elevations, and real-world materials are applied along with accurately matched daylight and environments to illuminate the model.

### Camera Matching

The survey data and point cloud information are vital. They allow the control points to be aligned with the real-world photo to a huge degree of accuracy. Without this information, the results are merely photomontages, open to interpretation and potential criticism. Virtual cameras are set up in modelling software which exactly match the technical settings and physical locations of the site visit cameras. Focal lengths, ISO settings, aperture controls and exposure speeds are all input along with the GPS readings. The point cloud data is visualised as cones in the model space and the virtual camera are aligned to match the baseline photos.

### View Creation

The final stage of the creation process is to merge the accurate camera-matched model with the corresponding baseline photo. Highly detailed renders are produced in the modelling software. These are then composited with the baseline photos in photo editing software. All objects (including buildings, walls, cars, trees, plants etc.) in front of the model will be masked out to blend the model accurately into the image.

To show the planting proposals over time, it can be useful to visualise how trees and shrubs might look at timed intervals, often between Year 0 and Year 15. This ensures that growth is properly referenced and that the results can be accurately assessed.

When following the above methodology, this final image is effectively the Verified View or Accurate Visual Representation.

collective

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Our Ref: 082005-CUR-XX-XX-T-C-00100-P01\_Section 73 statement on ES chapter 13

03.04.23

Carney Sweeney  
Crossway  
156 Great Charles Street Queensway  
Birmingham  
B3 3HN

FAO: Mr G Sweeney

Dear Mr Sweeney

**RE Proposed Section 73 Application to vary condition 4 of Outline Planning Consent  
17/02534/OUT – ES Chapter 13**

Curtins have been engaged as Civil and Structural Engineers by Sladen Estates in relation to the Bicester Arc development.

With regards to the Section 73 Application referenced above, this relates to a change in the overall height of the buildings, which will form part of the development. We have reviewed the Environmental Statement which was included in the original outline planning consent (titled “Bicester Office Park, Environmental Impact Assessment Volume 1: Environmental Statement” dated December 2017), specifically the chapters which are relevant to our services on the development going forward– “Chapter 13 Water Resources and Flood Risk”.

We can confirm that we do not consider the change in building height to have any impact on the content and conclusions of Chapter 13 Water Resource and Flood Risk, which formed part of the original Environmental Statement.

Yours faithfully



**Jon Moister**  
Board Director  
For and on behalf of  
**Curtins Consulting Ltd**

