

Water Eaton

PR6a : Land East of Oxford Road

Environmental Statement Appendix 4.2:
EIA Scoping Opinion

Bellway


**STRATEGIC
LAND**



*Christ Church
Oxford*

WE / SCO2 / P01

Planning and Development

David Peckford, Assistant Director – Planning and Development



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Your Ref: **21/01635/SCOP**

9th June 2021

Dear Sir/ Madam

TOWN AND COUNTRY PLANNING ACT 1990

Application No.: 21/01635/SCOP

Applicant's Name: Christ Church and the Water Eaton Estate

Proposal: Scoping Opinion – Environmental Impact Assessment (EIA) for the development of new homes, a two form-entry primary school, a local centre, associated infrastructure including public open space, drainage and engineering works

Location: OS Parcel 4347 East of Pipal Cottage
Oxford Road
Kidlington

Parish(es): Gosford And Water Eaton

I write in response to the Scoping Request submitted to the Local Planning Authority (LPA) on 22nd April 2021 accompanied by a Scoping Report. I have consulted with relevant colleagues both in Cherwell District Council and Oxfordshire County Council, together with other statutory authorities and consultation bodies. Their responses are below, largely set out in full and in some respects these may include matters that go beyond the site boundary. The responses can be read in full on the Council's website.

This Scoping Opinion relates to the allocated development site adjacent to Oxford Road, Kidlington (allocated in the adopted Cherwell Local Plan 2011-2031 Partial Review – Oxford's Unmet Housing Need, as site **PR6a**). The proposal includes the erection of 690 dwellings, primary school, local centre and associated infrastructure including public open space.

The LPA has reviewed the information provided in order to determine the potential of the proposed development having significant environmental effects and those aspects of the environment likely to be affected. In doing so, the LPA has had regard to the provisions of Regulation 15 of the EIA Regulations (2017) as well as the criteria for determining the potential for significant environmental effects, as set out in Schedules 3 and 4 of those Regulations.

Schedule 4 of the Regulations describes the necessary information required to assess impacts on the natural environment to be included within an Environmental Statement.

This letter should be taken as the formal Scoping Opinion of the LPA under the EIA Regulations 2017.

Matters to be Scoped In

Traffic, Transport and Movement

It is agreed that this should be scoped into the Environmental Statement.

Highways England (HE) is the highway, traffic and street authority for the strategic road network (SRN) which is a critical national asset. Consequently, Highways England would be concerned with proposals that have the potential to impact the safe and efficient operation of the strategic road network, in this case the A34 and in particular for this site, the A34 Bicester Road junction and A34 Peartree Interchange. The EIA submission and Transport Assessment will need to consider any potential impacts to the A34.

HE further advises that a robust access strategy is developed for the site. They would be concerned with any intensification of impacts to the A34 Bicester Road Junction without the consideration of any need for improvements to the junction. Further, due to the amount of committed development in this area, HE request that the impact of the development on the Wolvercote Roundabout junction is also robustly assessed because, although it is not on the SRN, it already has capacity issues in the weekday peak hours and further development traffic could result in significant blocking back, potentially onto the A34 mainline, which would not be acceptable to HE. This must therefore also be scoped into the Environmental Statement.

Oxfordshire County Council (OCC) as highway authority have also assessed the submission. The scoping note sets out that the applicant will be following IEMA guidance, which the County Council recommend. When undertaking the traffic assessment, the following considerations will need to be evaluated in line with Guidelines for the Assessment of Road Traffic; Severance; Driver Delay; Pedestrian delay; Pedestrian amenity; Fear and intimidation and Accidents and safety.

OCC will expect the following links to be assessed as part of the assessment – Oxford Road; A4260 Kidlington; A40; A34; A44 and A4165 Banbury Road.

Strategic schemes and mitigation schemes will be discussed through the planning process. It is expected that the construction phase will have the largest environmental impact so must be assessed fully. Any traffic growth on the local network above a 30% increase should be studied further. Sensitive links being affected by the development showing a 10% increase will also need further assessment. These will likely be the Cutteslowe, Wolvercote and Kidlington Roundabouts.

The EIA should include a Walking, Cycling and Horse-riding Assessment and Review (WCHAR) to look at the current network, impacts of the development during and post-construction – and what mitigation in the form of scheme design, landscaping, routing of paths, additional paths and surfacing, lighting, crossings and other measures.

Public rights of way through the site should be integrated with the development and improved to meet the pressures caused by the development whilst retaining as far as possible their character where appropriate. This may include upgrades to some footpaths to enable cycling or horse riding and better access for commuters or people with lower agility.

In summary, the methodology within the scoping is generally accepted, however, the highway authority consider that further scoping work as specified above is required to fully assess the impact.

OCC are also responsible for the provision of education and note that the allocation includes the provision of a two-form entry Primary School. However, it is further advised that the figure of up to 800 potential dwellings (i.e. 110 more than allocated) that the scoping report mentions in paragraph 3.2 would have a significant impact on the pupil generation of the development, and greater provision commensurate with any such increase would be required as a result.

OCC advise that the EIA should include consideration of travel patterns from the development to local schools. For primary education this includes to existing schools during any period between occupations commencing and the new school opening – the development would be broadly equidistant between Wolvercote Primary School and Cutteslowe Primary School, but the latter is more likely to have available capacity. However, the availability of capacity will depend on the relative timescale of this development and the Oxford Gateway development, and it may be that children have to travel further, perhaps up to Kidlington or the city, to secure a school place ahead of the new school opening. For secondary schools, in the longer term a new school is included in the plans for the Begbroke (PR8) development, but ahead of that pupils might attend a range of alternative local school locations, including Oxford, Kidlington, Bicester or Woodstock.

Air Quality

It is agreed that this should be scoped into the Environmental Statement.

The CDC Environmental Health Officer has no comment on the proposed EIA except that a damage cost calculation should be included in the Air Quality Report. The report should also include the provision of Electric Vehicle charging points for every residential property.

At 7.8 an assessment of receptors of the construction phase impacts is identified. However, this appears minimal in terms of its extent and does not appear to address the impacts of air quality beyond this area although construction traffic will come from beyond. Whilst it is accepted that dust may not be an issue beyond the area noted here, air quality in terms of traffic emissions should be considered more widely.

Noise and Vibration

It is agreed that this should be scoped into the Environmental Statement.

CDC Environmental Protection is satisfied with the approach outlined in the Scoping Report.

Drainage and Flood Risk

It is agreed that this should be scoped into the Environmental Statement.

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

Environment Agency (EA) have reviewed the scoping report. Section 9 of the report which discusses drainage and flood risk, incorrectly identifies that the entire site is within Flood Zone 1. A small section of the site in the south-eastern corner is within flood Zone 3 and the proposed report and proposed scope of assessment should be amended accordingly. This is critical to ensure that the ES considers the risk of flooding on this part of the site and any future increases in risk as a result of climate change. The fluvial modelling currently held by the EA for this location does not factor in the latest climate change allowances and it may therefore be necessary for the applicant to undertake a basic hydraulic model in order to establish an accurate baseline which will need to be reviewed and verified by the EA.

Given the relatively small area currently shown to be at risk of flooding, the EA would expect the floodplain to be protected and therefore no development proposed in that area.

The proposed development platforms, areas of excavation and infilling must be justified through the drainage strategy and fully assessed through the Flood Risk Assessment.

OCC as Lead Flood Authority advise that the proposed site location shows patches of flooding from surface water. Where car parking spaces and vehicle access roads are proposed, water quality standards must be met. A water quality assessment in accordance with Section 4 and Section 26 of the SuDS Manual will be required. The proposed development must meet local standards, L19, 'At least one surface feature should be deployed within the drainage system for water quality purposes, or more features for runoff which may contain higher levels of pollutants in accordance with the CIRIA SuDS Manual C753. Only if surface features are demonstrated as not viable, then approved proprietary engineered pollution control features such as vortex separators, serviceable/replaceable filter screens, or pollution interceptors may be used'.

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. This proposed change should mimic the existing drainage regime of the site as far as possible. Existing drainage features on the site should be retained, utilised and enhanced wherever possible. The Surface Water Management Strategy must set parameters for each parcel/phase to ensure that all attenuation and conveyance features 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.

Biodiversity

It is agreed that this should be scoped into the Environmental Statement as the constraints have identified that there may be several protected species and NERC S41 Habitats within and in the vicinity of the site. There are also several SSSI's within the vicinity of the site and it is noted that any impact and mitigation measures as a consequence of the impact of the development on these will be included in the assessment. It is noted that a number of surveys have been carried out to inform the scoping request. However, many of these are now more than 18 months old and should therefore be updated.

I have not yet received any comments from the CDC Ecologist, I shall forward under separate cover, once received.

Natural England have responded and provided advice on the scope of the Environmental Impact Assessment (EIA) for this development. The letter is attached for your information.

Landscape and Visual Amenity

It is agreed that this should be scoped into the Environmental Statement.

The scoping report has been assessed by the Landscape Officer who considers the methodology proposed to be acceptable. The viewpoints to be assessed as part of the LVIA should be agreed with the Council's Landscape Officers.

It should be noted that the visual impact of any changes resulting from the development platforms, which it is intended to create in some areas, must also be fully addressed and these do not appear to be mentioned here.

There are several existing trees and hedgerows within the site and along its boundaries. A full tree and hedgerow survey must therefore be carried out together with an Arboricultural Assessment. This should be included in the ES for completeness.

Heritage

It is agreed that this should be scoped into the Environmental Statement.

The site is within an archaeological alert area in respect of Cutteslowe deserted medieval village and there are tumuli within the site which are to be retained within the landscape design. The report sets out a general methodology for assessing the impact of the development on the historic environment which is appropriate in respect of archaeology. The scoping report does however state that a programme of geophysical survey has been undertaken and a trenched evaluation is currently nearing completion and proposes to append these reports to the Environmental Statement. The results of these field evaluations will also need to be fully incorporated into the cultural heritage section of the EIA in order that they are used to fully inform the assessment.

The comments of CDC Conservation Officer and Historic England are awaited. Any comments received will be sent to you under separate cover.

Population and Economic Effects

It is agreed that this should be scoped into the Environmental Statement. This chapter must also examine the impact of the proposals on the local community, including the existing population, housing provision, economy, recreational and community facilities and local services such as health facilities.

Climate Change

It is agreed that this should be scoped into the Environmental Statement.

The scoping note sets out that IEMA guidance will be followed which the County Council recommend, noting that IEMA have published 'Environmental Impact Assessment Guide to: Climate change Resilience and Adaption'. When undertaking the assessment, you will need to include a climate change resilience assessment and climate change impact assessment and climate change must be integrated into the design process and evident in design decisions.

The Flood Risk Assessment must also have regard to climate change and the impact of possible flooding on the site as a consequence of the development and the area of land within Flood Zone 3. The potential hydrological effects of the development include changes to the availability of water resources and water quality, the potential to pollute water and changes to water dynamics in terms of flow and source control with reference to flood potential. This must be addressed within the ES.

At 9.20 it states that the development will be constructed to the water consumption standards of the Building Regulations 2010 Part G. However, Policy ESD3 of the adopted Cherwell Local Plan requires a higher level of water efficiency that this development must accord to.

The ES must address Policies ESD1-5 of the adopted Cherwell Local Plan 2011-2031 and include a feasibility assessment and energy assessment in respect of mitigating and adapting to climate change, renewable energy, sustainable construction, decentralised energy systems and renewable energy. This should include an assessment of the principles of energy hierarchy set out in Policy ESD2 and how these have been applied; energy efficiency design measures as required by Policy ESD3; summary of proposed heating and cooling systems with regard to Policy ESD4 and choice and impact of renewable energy choices with regard to Policy ESD5.

Cumulative Impact and In-Combination Effects

This is a key consideration. The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the development in combination with other developments and activities that are being, have been or will be carried out.

I note that at 4.26 you advise that only the immediately adjoining sites, that is PR6b and the Oxford City allocation will be scoped in and only for the duration of construction. It is considered that there are likely to be cumulative impacts on a range of environmental parameters from all the Partial Review sites both during and post construction following occupation and for the ES to be robust in its content, these must be fully assessed through the ES submission which should be as an independent chapter.

There are also other significant sites in and around Kidlington which should also be assessed in terms of cumulative impact, and in particular traffic on the road network, such as the Oxford Technology Park, Begbroke Science Park and Oxford Airport, and other development sites within Oxford City Council area. Cumulative Impact and In-Combination Effects must therefore be considered further.

Matters Proposed to be Scoped Out

Ground Conditions and Contamination

The constraints have identified that the land could be potentially contaminated and as residential is a sensitive development, and consideration should therefore be given to **scoping this into** the Environmental Statement.

Lighting

It is noted that this has not been scoped in. However, it is considered that the lighting levels associated with this new development could potentially be significant both in terms of landscape impact, light pollution and impact on ecology. It is considered therefore that this should be **scoped into** the ES and therefore assess the impact of lighting, both during the construction phase and operational phase of the development and on nearby sensitive receptors such as local residents and wildlife.

Health and Well-Being

The current scoping document identifies that human health and health improvement are issues that are identified as unlikely to give rise to significant environmental effects, and, can be covered in a reduced scope of study and therefore scoped out of the ES. Whilst it may not be necessary to include this in the ES, issues relating to health and well-being improvements ought to be identified and covered in a health impact assessment using the Oxfordshire Health Impact Assessment Toolkit.

If you have any questions or queries regarding the above, please contact the Case Officer using the details provided above.

I trust this information is of assistance to you in the formulation of an Environmental Statement and should be treated as the Council's formal Scoping Opinion made under the EIA Regulations 2017.

Yours faithfully

Linda Griffiths

Linda Griffiths

Agreed By: Andy Bateson, Team Leader – Major Development