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Planning case officer

Cherwell District Council

Via the planning register website

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Dear case officer

Planning Application - 23/01233/OUT

Bellway Homes

OS Parcel 4347 East of Pipal Cottage Oxford Road Kidlington

The Applicants propose to deliver up to 800 new homes within the application site in order to meet the unmet housing needs of the City of Oxford. The housing will comprise the building of market and affordable homes. The proposal to deliver 50% of the total number of new homes as affordable housing is welcome. The proposal is accompanied by a wide range of environmental and other commitments. These reflect the scale of the scheme. The local planning authority will need planning conditions and planning obligations to satisfy itself that these commitments are delivered.

This letter focuses on four areas in particular which stand out at this outline stage.

- Housing for people with disabilities
- Biodiversity
- The impact on Cutteslowe Park
- The energy and sustainability strategy

Housing for people with disabilities

Paragraph 4.16 of the planning statement states that

... no provision is made as part of the proposed development for Extra Care Housing. In this regard, no reference or policy justification is made in the Local Plan Partial Review to a need for this type of housing to be provided within the application site. This matter was discussed with representatives of CDC, OCC and OXCC as part of the pre-application discussions and has resulted in Extra Care Housing not being proposed by the Applicants. If such provision is required by CDC, and can be justified, then the Applicants are willing to discuss this with CDC during the determination of this application.

(The expression 'ExtraCare housing' is used by the county council as the social services authority to describe housing for people with disabilities and for older people).

This is rather surprising and suggests the need for a review of the evidence base. It is an issue that should perhaps be re-visited and included in the supporting documentation, particularly in the access and design statements. There is a demand for housing for the elderly and people with disabilities and development on the scale proposed must be able to meet that demand. All new dwellings must now comply with the basic level of accessibility in Approved Document M of The Building Regulations. A significant proportion of the proposed dwellings of whatever tenure will need to be to that standard and a significant amount to the optional higher standard in part M. The higher standard only applies where a planning condition is imposed and so a suitably worded condition will be necessary. This will be in addition to any requirements of the county council. The local planning authority should review the evidence base and draw up a suitable planning condition.

Biodiversity

Much attention is devoted in the scheme to the impact of the natural environment, and rightly, so. For example, paragraph 7.68 of the Planning Statement states

... the development will result in the loss of the woodland and a small proportion of the hedgerow network, mitigation in the form of large areas of new, semi-natural habitats including wildflower and tussocky grassland, scrub and woodland planting and new ponds within drainage features will compensate for any losses and provide a significant net gain for biodiversity. These habitats will form a valuable green corridor, providing extensive new opportunities for most protected species recorded on-site. Where required and considered appropriate to mitigate the loss of opportunities on-site for ground nesting birds, a mitigation strategy will be agreed with CDC. Other mitigation measures will include nesting, refuge and roosting features throughout public open space for birds, bats and reptiles. A sensitive lighting strategy will limit the impact of lighting on retained and new habitats, allowing nocturnal species to remain within the site.

There is already local concern about the loss of hedgerow, and the proposed mitigation measures will need to be the subject of suitable planning conditions as local residents expect the mitigation measures to be effective.

Given the importance of the hedgerow to wildlife and natural habitat and as a significant landscape feature to the entrance to Oxford, its preservation must be paramount in the site's development. Its retention and the siting of the cycle and foot paths to the east side of it will give some protection and a more pleasing route to and from the station and Kidlington. Furthermore, the residents of the new houses will no doubt appreciate the screening it will give from traffic noise, pollution and light disturbance from passing vehicles.

Cotteslowe Park

The proposal includes a certain amount of public open space, which is to be welcomed. However, the southern boundary of the application site appears to be a boundary with Cutteslowe Park. The elevations of the proposed dwellings at the southern boundary of the development will need to be carefully considered in terms of their impact on the park. The park, owned by Oxford City Council, already presents a rather tired appearance, particularly when compared to University Parks. A development of this scale is going to generate a significant increase in visitors to the park. The application needs to acknowledge this and the local planning authority should require a financial contribution towards the upkeep of the park by way of a section 106 agreement or through the community infrastructure levy. This will need to be offered to and agreed with the City council. To put it bluntly, the park is going to take a hammering and the planning decision needs to acknowledge this.

Energy and sustainability strategy

Paragraph 3.5 says:

The proposal is to meet the full Future Homes Standard for the whole development from day one, with an EPC rating of level B as a minimum.

This is, of course significantly better than most homes in the country and in advance of the legal requirement. In addition, the applicant will 'consider' the provision of homes to the passivhaus standard at a later date in the application process. The offer to consider here reflects the policy of the local planning authority, which uses the same word. Whilst it is accepted that building homes to this higher standard is challenging, building some of the units to the standard would provide an almost unique selling point for the market housing and protect those on low incomes occupying the affordable units. Put simply, why not?

The carbon strategy of the development aims to create a pathway to net zero carbon. This will be achieved through careful design, local procurement, emphasis sustainable construction practices and an emphasis on active travel and electrification. Actions include:

- *Homes built to the Full Future Homes Standard effectively creating net zero ready dwellings. See comments above.*
- *Creation of a waste management/recycling strategy to reduce waste and associated carbon emissions.*
- *Following circular economy principles and embed the ability to re-use and re-purpose materials more than once.*
- *Minimising whole life carbon and lifecycle cost impacts through design (including maintenance, replacement, and disposal).*

All of these actions are highly commendable, but each one present its own challenges. Again, they will only work with detailed monitoring by the local authority and reporting back by the developer.

In conclusion, the need to translate an applicant's proposals into planning conditions and section 106 obligations may seem fairly obvious. But it is particularly important here, given both the scale of the development and also the use of some relatively novel technologies to achieve high standards of carbon reduction.

Thank you for considering this letter. Please keep me informed about the future progress of this application.

Yours sincerely

Tim Treuherz