

PLANNING, HOUSING & ECONOMY

John Hoad Strategic Director Planning, Housing and Economy



Andy Cattamole
Barton Willmore
7 Soho Square
London
W1D 3QB

Bodicote House •
Banbury • Oxfordshire
OX15 4AA

Telephone 01295 252535
Textphone 01295 221572
DX 24224 (Banbury)

www.cherwell.gov.uk

Please ask **Jenny Barker**
for

Our ref **10/01780/HYBRID**

Your ref

Direct Dial **01295 221828** Fax **01295 221856** Email **planning@cherwell-dc.gov.uk**

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Dear Andy

Application ref 10/01780/HYBRID, Phase 1 North West Bicester

I am writing with regard to the above application for planning permission. The following comments are based on assessment and consultation responses to the application to date and therefore should not be taken as the final response. However the application is raising a number of issues that it is appropriate to raise at this stage. In the comments below I have not repeated detailed comments that you have already had sight of in other representations.

1 Consistency of application documents and plans

- 1.1 Having reviewed the application it is evident that there are numerous discrepancies within the application documentation. The discrepancies range from the number of dwellings quoted in the application and the application documents, assumptions in supporting documents like the employment strategy that housing design will make provision for home working when it does not, café shown on landscape plans when this is not included in the application. The full list of discrepancies is too long to include but it is essential that the application is clear and consistent in its content to enable a proper assessment of the proposal.

2. Missing Information

There are a number of areas where the application does not provide sufficient information. The following details are required;

- To assess the proposal information on existing and proposed levels is required

- Detail of the cycle/storage buildings
- Detail of the design of the homezones
- Rain water harvesting details for properties
- Details of recycle bank siting
- Details of accommodation for the swap shop
- Details of vehicle tracking on the layout

3 Design & Access Statement

- 3.1 We have already had discussion with regard to the adequacy of the Design & Access Statement. I therefore think it is sufficient to say here that the submitted document does not adequately explain and justify the scheme that is presented in the application. I understand a revised Design & Access Statement is being prepared and I look forward to receiving this as soon as possible.

4 Layout

- 4.1 The layout contains a number of elements where the approach shown is supported. These include the access locations from the B4100 and the general location of the spine road, school site and neighbourhood centre. The potential mix of uses is also encouraging.
- 4.2 However there are a number of areas where the layout is not successful and fails to provide a satisfactory solution. Particular areas of concern are the encroachment of development into the stream corridor, the southern entrance to the site, the location of the play provision, the density of the scheme, the absence of features that make travel by sustainable means the most attractive option and lack of consideration of links to later phases. In addition there are a number of areas of detail where the layout is inadequate in detail. These include prominent side gables, lack of continuity in street scenes, lack of mix of house types/sizes, poor relationship with drainage features, plots with very small north facing gardens, parking spaces that are very difficult to manoeuvre in and out of, poor relationship of rear access to the properties to the front. These and other issues have already been identified by the Council's Urban Designer and therefore are not covered in detail here. However I have set out key areas below.
- 4.3 The scheme has a very low density even around the neighbourhood centre. Despite this the scheme still suffers from plots with very small curtilages and poor relationships and yet little feeling of space within the public realm and lack of space to incorporate natural SUDs features. The density has knock on implications with regard to effective public transport and energy delivery and the success of the scheme. I suggest the design is reconsidered with regard to the density that is currently being achieved and that this would assist in dealing with the further issues identified below.
- 4.4 The stream, although carrying little water, due to the land form is a distinctive feature of the site. It also provides the best opportunity for bio diversity gain. The current scheme proposes a corridor width that is insufficient to adequately accommodate bio diversity, play, drainage, informal recreation and important footpath/cycle route, particularly to provides links to later phases and the existing development in the town. The stream crossings divide the area losing the continuity of openness that

should be retained. The present proposals are unacceptable with regard to this area. To address this I suggest the width of the corridor is expanded, to a minimum of 30 meters either side of the stream at its narrowest, with significantly enlarged width where features such as play provision are accommodated. The corridor should be retained as such and therefore clear span bridges provided. Detailed plans showing enhanced biodiversity gain, clear and attractive foot path cycle routes that have the potential to link to further development and the existing town as well as an attractive landscape treatment providing a setting for buildings nearby are required. If play provision is accommodated it needs to be located where it is overlooked, although not so close to properties that there is potential for disturbance. Consideration needs to be given to the levels and accessibility where there is public access. Clarification is also needed on whether footpaths and cyclepaths are combined or segregated.

- 4.5 The southern entrance treatment is very weak and fails to adequately address either the existing or proposed road frontage. In the current design prominence is given to the side elevations of properties, rear elevations will be evident and there is no coherence to the built form or the landscape treatment. This is likely to be the first part of the development that will be seen and does not present a high quality design. The appearance of this area is so important in this very visible location and as such the proposal as submitted is not acceptable. I suggest this area of the layout is redesigned to create a more cohesive built form and landscaped entrance to the site.
- 4.6 It is hard to see measures in the layout that make it more attractive to walk cycle or use public transport than to use the private car. Parking remains high across the scheme. Garages only marginally smaller than the size recommended in OCC's parking guidance are proposed to avoid them being assessed as parking spaces but in practice they are designed to accommodate cars. The footpath and cycle networks are no more direct than the road network. Access to cycle storage is no more convenient than car access and a 30 minute bus service is unlikely to be attractive enough to attract a significant modal shift. In short the scheme does no more than many new developments in its layout to promote modal shift leading to doubt as to how the ambitious modal shift targets will be achieved. OCC have suggested that the green mode only link is reinstated in the scheme which would provide an incentive to walk or cycle to local facilities as opposed to using a car. It has also been suggested that garages are redesigned so they are not used as car parking up could provide storage or additional accommodation. I suggest both of these solutions are taken up so that there is a clear encouragement of the use of non car modes. You will also be aware that the need to enhance the frequency of the bus service has also been identified as necessary. The achievement of the modal shift targets in the PPS is ambitious and the layout needs to facilitate the achievement of the targets.
- 4.7 Although the application as submitted needs to be capable to standing alone you will be aware of the draft Core Strategy allocation of the land at NW Bicester. The design of the scheme should therefore take account of the proposed future expansion in its design and layout. The two areas where future connectivity is important is to the south of the southern field and to the south west of the northern fields. To the south of the southern

field it is important that good links to the local centre are designed from the south. It is also essential that future links to the existing town are carefully considered and allowed for in the current scheme. The present scheme makes adequate provision for all modes links back to the local centre but it appears little thought has been given to future pedestrian and cycle links. Furthermore I am concerned that housing and access is proposed very close to the hedge boundary and this would have an impact on potential development to the south. A cross section at 1:100 is needed with an accurate plotting of the site boundary and the existing hedge is required to assess the proposed impact. To the south west of the northern fields it is unclear how further access would be accommodated without increasing traffic through homezones. It would be prudent to consider how access could be obtained to the development of further fields now to ensure the layout provides flexibility with regard to the future. Finally it would also be prudent to consider how bio diversity corridors could be linked or extended in the future.

- 4.8 There are a number of detailed comments with regard the layout and I don't propose to set these out in detail here. However I remain to be convinced that the lack of mixing of house types and lack of variation in the house types themselves result in a satisfactory street scenes. There are also exceedingly small gardens proposed, which are unsatisfactory particularly where they are north facing. There are instances where sufficient room has not been left at the rear of parking spaces to enable vehicles to be reversed from the spaces. Access to put bins out is remote, properties where side and rear boundaries are prominent in the street creating dead frontage and poor relationships between properties. These all need to be addressed to produce an acceptable scheme.
- 4.9 The layout relies heavily on homezones both as a contribution to green infrastructure (GI) and play provision and to serve much of the development. The approach is welcome but no detailed design has been produced for the areas and therefore it has not been demonstrated that they are making any contribution to GI. Detailed designs of the home zones are required to enable an assessment.
- 4.10 The public house site is separated from the remainder of the local centre facilities on an awkward site close to residential properties. The inclusion of a public house in the scheme is welcomed. However the identified site would seem too restrictive to be attractive to operators, difficult due to the levels and that it could lead to disturbance to the residential properties nearby. The inclusion of the pub within the local centre should be explored, where it could remain overlooking the open space and contribute to the centres viability. Alternatively it needs to be demonstrated that the identified site is cable of accommodating the foot print applied for taking account the levels and proximity to residential properties.
- 4.11 The location of play areas has them all located at the periphery of the development parcels. Above I have commented on the location of the NEAP located in the stream corridor. However the LEAP at the northern entrance is particularly poorly located with an access to the B4100 which does not link to any path network.

5. Energy Strategy

- 5.1 The strategy outlines an approach that appears to deliver zero carbon. However there are concerns about the robustness of the solution (see attached Bio Regional note), the cost to the end user and whether aspects such as the access to wood pellet have been considered and the impact of supply. The energy strategy needs to be reviewed to establish whether the proposal is deliverable as part of the scheme. A statement is required addressing the concerns that have been identified and demonstrating the acceptable deliverability of the proposed solution.

6. Dwelling Design

- 6.1 Design comments have already been provided on the house types proposed and therefore these are not repeated. However the overall approach is disappointing. The lack of house types that turn corners, the very limited variation except the enriched types, the use of designs with full length windows which will then have blanked or obscured panels, the PV panels raised above the ridge, the lack of variation in dealing with cycle or waste storage and approach to car parking. The house types need to be reviewed and the concerns identified addressed.
- 6.2 Furthermore there is no detail in the application of how the PPS requirements regarding RTI, broadband or energy efficiency of the fabric are achieved. In addition rain water harvesting is started but with no details submitted. These deficiencies need to be addressed.

7 Employment

- 7.1 The economic strategy is not considered robust bases on which to demonstrate that the PPS requirement of one job per dwelling will be met. Of particular concern are the assumptions around home working and construction jobs which are not adequately justified. Furthermore the strategy does not deal adequately with implementation setting out clearly how the proposals will be achieved. Further concerns regarding the adequacy of the strategy are set out in the attached note. The economic strategy as submitted is not adequate. An amended strategy is required that clearly demonstrates the measures to be taken to deliver employment as part of the current application.

8. Community Infrastructure

- 8.1 The Hunt Dobson Stringer report is based on population figures which are not agreed and represent a less accurate population projection than those figures that have been produced for the site by Oxfordshire County Council. The figures also take no account of development that has been permitted in the town that will also impact on community infrastructure.
- 8.2 The Hunt Dobson Stringer report also fails to take any account of the PPS standards which state '*Planning applications should include a good level of provision of services within the eco-town that is proportionate to the size of the development. This should include leisure, health and social care, education, retail, arts and culture, library services, sport and play facilities and community and voluntary sector facilities.*'. In addition no consideration is given to the need to achieve modal shift and the role access to facilities has in that regard.
- 8.3 The application does not provide clarity over the provision of community

infrastructure. Whilst discussions and correspondence are on going with regard to the delivery of infrastructure and agreement of contributions these issues will need to be resolved to enable the application to be determined.

9. Green Infrastructure/ biodiversity/ Landscape Impact

- 9.1 You will be aware of the comments that have now been received from Natural England, the Councils ecologists, and from the local wildlife trust BBOWT with regard to the application. You will also be aware of the concerns they raise regarding the adequacy of the survey work with regard to the absence of wintering bird surveys, consideration of impacts of air pollution, the lack of consideration of Conservation Target Areas (CTA) and the achievement of bio diversity gain. With regard to wintering bird surveys I understand that these have now been carried out and I suggest the application is amended to address this as well as the concerns raised with regard to consideration of air pollution and CTAs.
- 9.2 I have already set out above the suggestion that the stream corridor is widened and that redesign of this area could address a number of issues including providing greater potential for bio diversity gain. The application as submitted does not provide an adequate strategy for biodiversity gain.
- 9.3 Above I have also referred to the homezones proposed. These make up a very significant proportion of the green infrastructure proposed and also provide the location for small childrens play in the absence of local areas of play (LAPs). In the absence of details showing that these are making a genuine contribution to both the green infrastructure and play provision the application is deficient in both. Surface water storage features are shown within areas of play provision and open space areas. The Council would normally seek to exclude all services from open space and particularly from play areas due to the impact on future changes to the area, disturbance during maintenance and the need for access. In this case services should also be removed from open space areas where possible (with the exceptions of ponds and swales for surface water) and where it is not possible to remove them details of the structures are required and identification of potential maintenance and management regimes to assess the impact on the areas.
- 9.4 The application proposes play provision which has the potential to be an imaginative solution that addresses site constraints. Concerns regarding the siting of the NEAP within the watercourse corridor have been set out above and the LEAP adjacent to the northern entrance to the site. Above the issue re the impact of services is also highlighted. Further detailed comments will be provided but it is also worth highlighting that there is considerable repetition on the equipment proposed and each site should be designed to be distinctive and provide a range of play experiences across the site. In addition whilst an imaginative approach to incorporating water features is proposed such as the SUDs pond and boardwalk the access to drainage features for maintenance and the safety of the proposals such as the decked area over the pond needs to be addressed as it is likely a hand rail would be required.
- 9.5 The visualisations that accompany the application are helpful but highlight the long term impact of the scheme in views from beyond the site. These are shown mitigated primarily by a single row of trees adjacent

to the hedgerow. As a result views to properties remain in the long term. The lack of variation in the built form results in the intrusion of regular roof forms in a number of the views. Further consideration should be given to the view to the site and how the built form and landscape treatment can be used to achieve attractive views where buildings are not intrusive.

10. Drainage & Water Issues

10.1 You have already received from the Environment Agency a comprehensive set of comments. You have also received the comments of the County Council which include some comments with regard to the sustainable drainage features, for which they will be the adopting authority. These comments are not repeated and I understand discussions are underway to address these. However there appears to be important areas where the details submitted are not adequate. The water cycle study is general in its approach and does not address what is to be provided in this phase of the development. There are no proposals looking towards water neutrality although this is highlighted within the PPS as a requirement. It is unclear the extent of foul drainage upgrades required to accommodate the proposed development. These and other inadequacies need to be addressed.

10.2 Of particular concern is the approach to SUDs which relies on underground storage and conveyance structures rather than surface features. This does not represent best practice and is a very disappointing approach particularly given the low density nature of the scheme. The approach to SUDs needs to be reviewed and the proposals improved.

11. Waste

11.1 The waste strategy presents ambitious targets which are supported but the strategy is unconvincing due to the lack of detail on delivery. Measures to prevent construction waste being sent to landfill are required and details of how the measures proposed to reduce waste from the development are to be implemented are required. This includes details of how measures will be provided, who will be responsible for initiating them, who will pay for them and who will manage and monitor them. Without these details the strategy will not be effective. The strategy therefore needs to be amended to include these details and demonstrate the proposals are deliverable.

12. Community Governance

12.1 Consideration of local community governance is on going. The strategy submitted with the application is a useful starting point however there is a need to ensure that roles and responsibilities are clearly identified and funding to carry out the requirements is provided. There are areas proposed for the management organisation such as construction management and tenant management seem to be inappropriate. There is a lack of detail over the funding of the responsibilities vested in the management organisation and this is key to whether the organisation will be effective. Finally the management organisation needs to be capable of evolution as the development of the NW Bicester site is developed. In short further work is required to define the role and funding and governance of the community governance proposals for the exemplar. An acceptable initial approach to community governance will need to be established prior to the determination of the planning application or alternative arrangements for the running and managing of issues will need

to be established, at least as an interim measure, and secured through a legal agreement.

13 Masterplan

- 13.1 The masterplan accompanying the application has a number of shortcomings and needs to evolve further to be an acceptable approach. Never the less the masterplan does show how the exemplar application could form part of a larger whole. The implementation strategy identifies two potential approaches to bringing the site forward. The development of the site in a piecemeal fashion is not acceptable to the local authorities and therefore an outline application supported by a detailed masterplan is sought as the framework within which any further phases of development come forward. Neither the implementation strategy or assimilation strategy deal with the matters identified in the transition section of the PPS for the current application or to show how an acceptable longer term strategy could be developed for the delivery of the infrastructure for the site. These omissions need to be addressed.

14 Transport

You have received comments from the County Council with regard to transport matters. I have referred above to the concerns regarding the inadequacy of measures to deliver modal shift and suggested alterations to the proposal. Comments have also been provided to you regarding the travel plan, matters of detail design and off site contributions. It is essential the application delivers the significant incentives to encourage modal shift and the present scheme fails to deliver this. Matters of detail design must also be addressed to enable the application to be determined and Heads of Terms agreed for a legal agreement.

I trust the above comments will be of assistance to you in amending the submitted scheme. If it would assist to discuss the details further I am happy to do so. I would reiterate at this stage that they are not exhaustive and further consultation responses are still awaited.

Yours sincerely

Jenny Barker
Eco Bicester Project Manager