

## **OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO CONSULTATION ON THE FOLLOWING DEVELOPMENT PROPOSAL**

**District:** Cherwell

**Application no:** 14/00002/SCOP

**Proposal:** SCOPING OPINION - Proposed development comprising up to 4,000 residential dwellings, district centre and business centre, primary and secondary schools, renewable energy park, heritage and visitor facilities, linear park, community open space, sports and recreation, landscaping and associated utilities and infrastructure

**Location:** Heyford Park Camp Road Upper Heyford Bicester OX25 5HA

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**This report sets out Oxfordshire County Council's view on the proposal.**

**Annexes to the report contain officer advice and the comments of local members.**

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**Officer's Name:** Lisa Michelson

**Officer's Title:** Locality Manager

**Date:** 25 April 2014

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**ANNEX 1**  
**OFFICER ADVICE**

**District:** Cherwell

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## Transport

### Detailed Comments:

#### Introduction

The application is a formal request for a Scoping Opinion for up to 4,000 additional residential dwellings, a circa 4.5 hectare district centre and 6.6 hectare business centre, primary and secondary schools, renewable energy park, heritage and visitor facilities, linear park, community open space, sports and recreation, landscaping and associated utilities and infrastructure. A Transport Assessment scoping report has been submitted (comments below).

#### Constraints

Oxfordshire Structure Plan Policy H2 limits development at this site to around 1000 dwellings. A 2008 planning application was the subject of a Public Inquiry in 2010 and the Secretary of State granted planning consent for development to a maximum of 1,075 dwellings and around 1,000 jobs. This proposal of 4,000 additional dwellings on top of the permitted 1,075 would be in breach of Policy H2 and the previous Inquiry decision.

This rural site is constrained in terms of its unsustainable location, distance to key settlements and employment sites, lack of frequent and convenient public transport options, surrounding rural highway network that is not conducive to carrying large volumes of traffic and known problem areas such as the B430 Middleton Stoney staggered cross-road junction.

#### Transport Strategy Comments

A Transport Assessment must be produced for the proposed development to be assessed by Oxfordshire County Council (OCC).

A detailed review of transport policy and guidance contained within the National Planning Policy Framework and Oxfordshire County Council's Local Transport Plan 3 (amongst other current national and local policy and guidance) must be provided within the Transport Assessment.

It must be ensured that the road network can accommodate the vehicle trips that are required for access, as well as longer distance journeys.

It is noted that on the title page for Appendix 3 (Transport Assessment Scoping Request & Scoping for Transport Assessments Form) of the EIA Scoping Report that it states "subsequent discussions held with OCC regarding the use of the transport model, supersede references to the model to be used as set out in these reports". The section on Traffic Impact in Appendix 3 is therefore considered to be superseded and will need to be negotiated.

OCC's current Central Oxfordshire Transport Model (COTM) and Bicester SATURN models are not fit for the purpose of assessing the traffic impacts on the surrounding highway network. The COTM model is Oxford-centric and the Bicester model is Bicester-centric, so both models fail to provide reassuring assignments in the Heyford area.

OCC have engaged consultants to develop a revised model for Oxfordshire called the Oxfordshire Strategic Model (OSM) that will encompass the Heyford area in more detail and will be fully up to date. This model would be our preferred model to test the development. The consultants are working to a deadline to deliver the model in July 2014 and it is our recommendation to wait and use this model for the purposes of the Transport Assessment. Once this model has been developed and the proposed development tested, potential problem junctions highlighted by this can be investigated further through PICADY, ARCADY, LINSIG/TRANSYT.

Future year scenario testing must take into account committed development and infrastructure, particularly what impact a new development at Heyford would have on the land use and infrastructure currently proposed for Bicester.

A test case including Transport impact mitigation should be modelled, in addition to a development impact test case, to assess the impact any proposed transport mitigation will have on the transport network.

Reducing the need to travel will need to be demonstrated as an element of keeping any traffic impact to a minimum. Individual Travel Plans for all elements of the proposed development must be provided for submission with the Transport Assessment to be assessed by OCC, in order to promote more sustainable modes of travel than single occupancy car use.

An agreed comprehensive plan for public transport provision must be submitted, as per separate public transport comments made below.

Northamptonshire county council transportation planning and transport development control teams must be made aware of the proposals at an early stage as there is likely to be a significant impact on the A43 past Brackley, for example.

#### Public Transport comments

The developer must submit an agreed comprehensive plan for public transport provision.

The site is remote from strategic public transport corridors. The developer's plan must consider how the new residents and employees can travel to and from key settlements and transport nodes for onward travel (such as rail stations). The developer's plan must also consider the site's spatial arrangements, so that it can be served by a single public transport spine, with buses at frequent intervals.

Providing a site with high public transport use is critical to the site's impact on the surrounding road network. The developer is encouraged to explore best practice for the provision of an attractive public transport component to the development.

The developer should discuss potential public transport networks, concepts and funding proposals with the Council, throughout development of the masterplan and other stages of the planning process.

#### Rights of Way Comments

Equestrians are not included in the EIA or TA – they need to be included as this area is a key location for riding and development impacts will have a major impact on equestrian users. This includes road measures for the proposed roundabout access at the Camp Road/ Chilgrove Drive/ Ardley Road/ Middleton Stoney Road junctions.

The EIA might also take account of the mitigation measures included in the Lead Appeal and Outline Application for the 1,075 dwellings and take these forward alongside increased provision for walkers, cyclists and horse-riders onsite and off-site.

Specific comments on the EIA:

3.31 – TA needs to assess impacts on equestrians

3.32 - Road is the A4260 not the A420

3.39 – baseline section needs to include equestrian network and users

Specific comments on the TA scoping:

3.4 – walk and cycle should include horse riding

4.5 – add horse riding to the walk and cycle strategy

6.2 - include equestrians/horseriding in the proposed walk and cycle measures

#### Area Steward's Comments

The Area Steward would wish to see improvements to local road access to the wider network. The local village network currently fails regularly and we would have concerns over a significant increase in traffic to these areas.

#### Drainage Team comments

This is a scoping enquiry only so there is no specific information to comment on at this point

A full drainage plan and calculations will be required and approved by the Lead Flood Authority (Oxfordshire County Council Drainage Team). A full SUDS drainage design will be required, with greenfield run-off or better post development.

#### Network Management Comments:

A routing agreement will be required for this development due to the likely impact a development of this size would have on the local road network.

#### Comments on PBA's Transport Assessment Scoping Report

- 1.4.1 – Will there be a requirement for Secondary school provision on the site? Also, significant transport infrastructure should be clearly identified as a key element of the proposed development.
- 1.5.4 - Please refer to OCC's recently adopted guidance on TAs and Travel Plans.
- 2.4.1 - Please note that Oxfordshire's Local Transport Plan 2011 – 2030 is currently being updated. Also, please include Oxfordshire Structure Plan Policy H2 and OCC's TAs and Travel Plans guidance document in this section.
- 3.2.1 – Please confirm the survey periods proposed for assessing the extant traffic generation of the site.
- 3.5.2 – Unsure why specific details of local rail provision are being included at this stage. Please ensure that the public transport details (bus and rail) are included in any Transport Assessment.
- 3.6.1 - The proposed study area is not clearly identified. Figure 3 in the appendix indicates certain junctions to be assessed, but more may be required once strategic modelling work is carried out. For clarity the extent of the entire study area including routes is required. With known committed developments in the Bicester area and the likely impact of this proposal, the study area may well need to extend to junctions in and around Bicester.
- 3.8.1 - Traffic survey data, carried out for an appropriate and representative survey period will be required for consideration. Please also refer to Transport Strategy comments on the requirement for the Oxfordshire Strategic Model (OSM) to be used to assess the impact of the proposal.
- 4.6.1 - An HGV strategy will need to be included within the vehicle access strategy.
- 4.8.1 – Individual Travel Plans will ultimately be required for each proposed site use (residential, commercial, education etc).
- 4.10.1 – Any adjustments made to TRICS trip generation figures to take account of smarter choices will need to be fully quantified and agreed with OCC. It is unlikely that there will be many survey locations in the TRICS database similar to Heyford, let alone ones that have achieved significant modal shift from smarter choices measures.
- 4.10.3 – Trips to the two proposed primary schools and proposed district centre are assumed to be internal to the site. In reality, factors such as parental choice over their child's school and the potential attraction of a district centre for the surrounding area will likely generate trips into and out of the proposed development area for these two use classes. A sensitivity analysis will be required.
- 5.2 – 5.5 – Please refer to Transport Strategy comments above re strategic transport modelling requirements. A bespoke spreadsheet model will not be acceptable.
- 5.7.2 – Timescales (application registered 2014, year of opening 2015) seem optimistic, particularly given the level of strategic transport modelling work required, the timetable of the OSM work

and the likely requirement for detailed further pre-application advice. Also, the construction work associated with the consented Heyford scheme (1,075 dwellings etc) has just commenced (approx. three years after consent granted) and will presumably continue for a number of years, subject to developers' timetable and market factors.

- 5.5.7 - 2031 Test Case 1– Which 'Reference Case' is this referring to?
- 5.9 - Please provide a list of the committed development to be taken into account by this proposal.
- 5.10.2 – Refer to comments above (5.2 – 5.5). A spread sheet model will not be acceptable. For example, a spread sheet model will not be able to forecast rerouting of traffic that occurs when a particular route or junction becomes congested.
- 6.2.1 - Re proposed walking and cycling measures to connect the site with 'external routes and facilities'. There needs to be a realistic assessment of the site's location, the distance to other major settlements and facilities, and whether these distances exceed the average person's likely recommended walking and cycling distances/ durations.
- 6.3 - No mention of Rail travel measures. This needs to be considered.

**Officer's Name:** Judy Kelly

**Officer's Title:** Senior Engineer

**Date:** 23 April 2014

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### Archaeology

#### Recommendation:

No objection

(No objection at this stage)

#### Key issues:

The scoping document states that the EIA will contain a chapter setting out and assessing the cultural heritage of the site which will include a desk based assessment (DBA) assessing the archaeological potential of the site.

We would agree that the DBA will need be included in the EIA as set out in the scoping opinion.

#### Conditions:

Not at this stage

#### Detailed Comments:

The scoping document states that the EIA will contain a chapter setting out and assessing the cultural heritage of the site which will include a desk based assessment (DBA) assessing the archaeological potential of the site.

We would agree that the DBA will need be included in the EIA as set out in the scoping opinion.

It is likely that we will require that the results of an archaeological field evaluation will need to be submitted along with any planning application for the site but this will be determined after the submission of the desk based assessment.

**Officer's Name:** Richard Oram

**Officer's Title:** Planning Archaeologist

**Date:** 16 April 2014

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### **Economy and Skills**

#### **Recommendation:**

No objection subject to conditions

#### **Key issues:**

- The development of 4,000 new dwellings and associated transport and green infrastructure, along with a district centre, business centre, renewable energy park and heritage visitor centre will generate a significant number of jobs, both at construction and end user stage.
- The build out rate indicates that the development will take approximately 15 years to complete (para. 2.22), suggesting that construction training and employment opportunities will be available on the site in the long term.
- The proposed development will be subject to a detailed Employment & Skills Plan (ESP) to guide the provision of local training (including apprenticeships) and employment opportunities for local people.

#### **Conditions:**

- The requirement for an Employment & Skills Plan will be a condition in the event of Cherwell DC providing planning consent for this development

#### **Detailed Comments:**

- The EIA will be required to assess detailed employment and unemployment statistics (including take up of out-of-work benefits) in the local and wider area (Cherwell district) so it can be ascertained the number of local people available to take up the training and employment opportunities.
- The EIA will also be expected to highlight the availability in the Cherwell area of statutory and non-statutory institutions and public/private and voluntary agencies with which it will liaise to ensure that local people have access to the training and employment opportunities available.
- The detailed information to be included in the EIA will then inform an Employment & Skills Plan to be provided by the developer, and agreed by Cherwell DC and Oxfordshire County Council. To be updated annually as the development progresses.

Recent policy initiatives relating to skills development are contained in:

- The Oxfordshire City Deal
- Oxfordshire European Structural Investment Fund (ESIF) Strategy



- Strategic Economic Plan

The recently launched **Oxfordshire Skills Strategy** has five strategic priorities:

- SP1: To meet the needs of local employers through a more integrated and responsive approach to education and training: developed in partnership with our provider network, to encourage more training provision in priority sectors - both current and projected - to meet the needs of employers or to train future entrepreneurs, particularly in science, technology, engineering and mathematics (STEM).
- SP2: Creating the 'skills continuum' to support young people through their learning journey: the ambition is to develop integrated, seamless services that support young people through school and on into training, further education, employment or business, where they understand the full breadth of career options, including local demand, and the training path to succeed in that career.
- SP3: Up-skilling and improving the chances of young people and adults marginalised or disadvantaged from work, based on moving them closer to the labour market.
- SP4: To increase the number of apprenticeship opportunities, particularly those offered by small to medium sized businesses.
- SP5: To explore how we can better retain graduates within Oxfordshire to meet the demand for the higher level skills our businesses need.

### **Employment and skills planning justification**

A better, appropriately skilled local workforce can provide a pool of talent to both developers and end occupiers. This will reduce the need to import skills, and in doing so reduce congestion and unsustainable travel to work modes, reduce carbon emissions and the pressure on the local housing infrastructure.

Seeking skills and training planning obligations/conditions to maximise the potential of the existing population to compete for the jobs being created, whether during the construction phase or end user phase, through improving their skills levels, is necessary to ensure that future development is economically and socially sustainable, and that barriers to employment for those marginalised from the workforce are removed.

Developers often identify projected training and employment outcomes as part of the justification for development. It is important therefore that the impacts of economic development are mitigated and the economic benefits of new development in terms of improved local skills and employment outcomes are realised.

Not only is it clear that skills levels are a key determinant of a sustainable local economy, but they also have an impact on employment opportunities and thus an individual's economic prosperity. Up-skilling the area's labour force will be key to maintaining economic competitiveness. It will also bring wider benefits in terms of income equality and, potentially, a reduction in child poverty. Securing obligations/conditions for skills development and employment of local people will be necessary to enhance social inclusion by reducing the potential for economic and social disparity, another key policy driver at the local level.

**Officer's Name:** Dawn Pettis

**Officer's Title:** Economic Development Strategy Officer

**Date:** 22 April 2014

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### **Education**

#### **Recommendation:**

No objection subject to conditions

#### **Key issues:**

- A full assessment of the likely pupil population impact of such a large development would be required.
- In the absence of sufficient information about the type and timescale of housing, this number of houses could be estimated to generate a need for up to 3 primary schools, each of up to 2 form entry size.
- It would also generate sufficient secondary aged pupils to require a substantial secondary school.
- This development would need to provide sufficient school capacity, either on site or through contributions towards off-site schools.

#### **Legal Agreement required to secure:**

Sufficient school capacity, including for early years education, either on site or through contributions towards off-site schools.

#### **Detailed Comments:**

There is currently a 2 form entry Free School for 4-19 year olds within the Upper Heyford development area.

The application states:

*2.17 The Proposed Development would involve a revision to the previously consented educational provision at Heyford Park to accommodate the estimated increase in student in-take across all school years. The previously consented Free School, described as an 'all-through school' providing primary and secondary education (4 to 19 years), would be converted to a secondary school. The secondary school would occupy circa 1.53 hectares of land and additionally sports playing fields and facilities located elsewhere on the site. It is proposed to construct two new primary schools, together occupying circa 4.32 hectares of land, which would be spatially located to achieve the circa 800m walking distance from the residential design catchment, as set out in BREEAM Communities guidance.*

Any changes to the age range and capacity of the existing Free School would need to be subject to Department for Education (DfE) approval, and would require changes to their Funding Agreement. Academy sponsors would need to be identified for any additional new schools; the existing Free School could apply to also operate the additional schools, but this would be subject to DfE approval.

The application states:

*3.21 Education Provision would be assessed by undertaking a full assessment of current and future capacities of schools within the catchment area of the Application Site. An indicative dwelling mix will then be used alongside expected pupil generation rates per dwelling to estimate the number of children likely to be generated by the Proposed Development which can then be compared against the current and future capacity of the assessed schools.*

Oxfordshire County Council would be responsible for specifying the requirement for new schools, to ensure it is able to meet its statutory duties for sufficient school places. OCC would need to agree the pupil generation methodology, and this would be expected to be the PopCal methodology used across the county.

Sufficient primary school capacity would need to be provided within the development area to meet the full needs of the development. If sufficient secondary school capacity is not to be provided within the development area, early liaison with OCC would be essential to ensure the impact on other schools, both existing and planned, can be considered.

The application states:

*3.75 The guidance contained within Building Bulletin 93 (BB93) will be used in order to determine the suitability of the site for a school. BB93 gives the performance standards for new school buildings to prevent disturbance to its users.*

The county council would also expect new schools to comply with OCC's Authority's Requirements, in terms of area, design and site specific requirements. It cannot be assumed that the new schools will be operated by the same trust as the current Free School, as this would be a matter for the DfE. We must therefore ensure that new school sites and buildings are acceptable to any potential appropriate sponsor.

BB93 in the Building Bulletin for Acoustic design in schools. Other design guidance and standard specifications is shown below.

## **DESIGN GUIDANCE**

Much of this guidance is under review, with the aim of streamlining and consolidating it. Updated versions are likely to be issued in the future.

- BB 102, Designing for disabled children and children with special educational needs, TSO 2008
- BB 99, Briefing Framework for Primary School Projects, TSO 2006
- BB 98, Briefing Framework for Secondary School Projects, TSO 2004)
- BB 96, Meeting the educational needs of children and young people in hospital (DES/DOH) TSO 2003
- BB 95, Schools for the Future: Designs for learning communities, TSO 2002
- BB 93, Acoustic design in schools
- BB 92, Modern Foreign Languages Accommodation: A Design Guide, TSO 2000
- BB 89, Art Accommodation in Secondary Schools, TSO 1998
- BB 88, Fume Cupboards in Schools, TSO 1998 (note – will be revised by CLEAPPS)

- BB 81, Design and Technology Accommodation in Schools: A Design Guide, TSO, revised 2004
- BB 80, Science Accommodation in Secondary Schools: A Design Guide, downloadable only, revised 2004
- BB 79, Passive Solar Schools: A Design Guide, TSO 1995
- Design of sustainable schools: case studies, TSO 2006
- Designing School Grounds, TSO 2006
- Music Accommodation in Secondary Schools: a design guide, NBS/RIBA 2010
- Project Faraday - Exemplar designs for science, TSO 2007

## **STANDARD SPECIFICATION, LAYOUTS AND DIMENSIONS (SSLDS)**

The Standard Specifications, Layouts and Dimensions (SSLD) booklets were developed specifically for the BSF programme, but they also have an ongoing value. The series sets out the standards for a range of elements in schools and shows how these standards might be delivered through design examples. They aim to disseminate best practice and avoid 'reinventing the wheel' every time a school building is designed.

- SSLD Guidance 1: Partitions in Schools, DCSF 2007
- SSLD Guidance 2: Floor Finishes in Schools, DCSF 2007
- SSLD 3: Toilets in Schools, DCSF 2007
- SSLD 4: Lighting systems in schools, DCSF 2007
- SSLD 5: Roof coverings in Schools, DCSF 2008
- SSLD 6: Internal stairways in schools, DCSF 2008
- SSLD 7: Internal door sets in schools, DCSF 2008
- SSLD 8: Sprinklers in schools, DCSF 2008

**Officer's Name:** Barbara Chillman

**Officer's Title:** Service Manager, Pupil Place Planning

**Date:** 15 April 2014

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### Property

#### Key issues:

- As this is a scoping opinion enquiry, we are not able to provide detailed comments as we do not know the housing mix or when the development is likely to take place and hence we are unable to calculate the population generated by the proposal. Due to lack of development information we are unable provide details of the financial contributions that would be required to mitigate the impact of this proposal
- If the proposal was to take place the County Council would expect that any additional strain on its existing community infrastructure would be mitigated.
- The County Council may require contributions towards: Library, Strategic Waste and Recycling Facilities, Museum Resource Centre, Social & Health Care (Adult Day Care) and Adult Learning.

Example only not specific: Contributions will be graded according to the dwelling type

Property		1 Bed	2 Bed	3 Bed	4 Bed	ECH
○ Library	£	109	163	249	355	106
○ Library (book stock only)	£	26	38	59	84	25
○ Waste Management	£	82	123	188	268	80
○ Museum Resource Centre	£	6	10	15	21	6
○ Social & Health Care	£	154	198	209	198	1,375
○ Adult Learning	£	20	25	30	37	N/A

- The services may be reviewed in the future and other services areas may be included.
- They may also vary depending on the details of the final proposal.

- The County Council as Fire Authority has a duty to ensure that an adequate supply of water is available for fire-fighting purposes. There will probably be a requirement to affix fire hydrants within the development site. Exact numbers and locations cannot be given until detailed consultation plans are provided showing highway, water main layout and size. This is usually dealt with by condition.
- The County Councils legal fees in drawing up and/or completing a legal agreement will need to be secured.
- Oxfordshire County Council will also require an administrative payment for the purposes of administration and monitoring of the proposed S106 agreement.

**Officer's Name:** Oliver Spratley

**Officer's Title:** Asset Strategy Support Officer

**Date:** 15 April 2014

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### Ecology

#### Recommendation:

Objection

#### Key issues:

The Upper Heyford Airfield Local Wildlife Site is within the proposed development site. Therefore, I object to the principle of development in this location, which would be contrary to planning policy.

Local Wildlife Sites should be protected by planning policies and guidance (Policy ESD 10 of the Draft Cherwell Local Plan and NPPF).

***Development of this site risks Judicial Review against Cherwell District Council and there is a reputational issue for Cherwell, also for OCC if we are supporting the proposals. Please can you raise these issues with officers at OCC and Cherwell who are involved in this scheme, so that they are aware of the implications of development at this site at an early stage. Gavray Drive is an example of a recent Judicial Review, the application site contained a Local Wildlife Site and a revised application has subsequently been submitted to Cherwell District Council with a layout that avoids that Local Wildlife Site.***

There also appears to be a large population of Great Crested Newts (European Protected Species) in the area that could add to development costs and time. The area is valuable for its botanical interest and for species, including UK priority species under the NERC Act 2006.

#### Detailed Comments:

Due to the high ecological value of this site, I consider that development should not be permitted in this location.

Notwithstanding this, if the applicant continues to promote this development I have the following comments:

- the EIA should be prepared following the CIEEM 'Guidelines for Ecological Impact Assessment in the United Kingdom' (2006). A data search from the Thames Valley Environmental Records Centre (TVERC) should be included as part of the desktop study to inform the scope of the EIA.
- The Ecological Constraints Plan in Appendix 5 only shows the original Local Wildlife Site and not the extension that has since been designated as LWS to the south-east, following 2013

ecological surveys. TVERC would be able to provide the correct LWS boundary and the applicant's ecological consultant should use this as a basis to inform the EIA.

- The applicant should ensure that they fully recognise the ecological value of the site and ensure that they have sufficient information on the site to include in their EIA. For example, paragraph 3.159 of the EIA Scoping does not list invertebrate, wintering bird or botanical surveys amongst those anticipated. I consider that these surveys would be necessary.
- The site is valuable for UK Priority Habitat of lowland calcareous grassland, great crested newts (a European Protected Species), grassland, invertebrates and ground nesting breeding birds. Species found on the site include European Protected Species, UK priority species and Birds of Conservation Concern.
- The Scoping EIA proposes that the EIA would only assess ecological features or resources of value at or above the District level. I do not think that this is acceptable or normal practice, as it risks ignoring the local impacts of development on important species and habitats.
- The EIA would need to explain how impacts would be mitigated or, as a last resort, compensated to result in a net gain in biodiversity (in line with NPPF). However, given the ecological value of the site that would be lost I do not think that it would be possible for the development to result in a net gain in biodiversity even if substantial biodiversity mitigation, compensation and enhancements were proposed.

The District Council should be consulting their ecologist, Sarah Postlethwaite.

**Officer's Name:** Tamsin Atley  
**Officer's Title:** Ecologist Planner  
**Date:** 22 April 2014

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### **Environment and Resource Efficiency**

#### **Recommendation:**

No objection subject to conditions

#### **Key issues:**

This development of 4,000 homes will have a significant impact on the county's ability to meet its carbon reduction targets for 2030, which in turn reflect the national statutory carbon budgets.

The EIA needs to include an assessment of the developments' climatic impact due to the increased emissions of Greenhouse gases from all sources.

The proposed solar PV farm is welcome as one form of mitigation. Other forms of mitigation such as a local CHP scheme and/or the use of heat from the Ardley Energy from Waste facility should also be considered.

#### **Conditions:**

Include consideration of the climate impact within the EIA scope

**Officer's Name:** Nick King

**Officer's Title:** Energy Strategy Officer

**Date:** 04 April 2014

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