# SGR 1 Bicester – Consultation – Officer Comments

|  |  |  |
| --- | --- | --- |
| **Topic** | **Comment** | **Response** |
| Sustainability | There is also a requirement to consider the proposal against how the development could be adaptable to future climate change. This includes being designed to incorporate best practice on tackling overheating, maximising daylight, consideration of the orientation of dwellings, the use of materials with low embodied carbon, meeting fabric energy efficiency standards, including water neutrality measures and incorporating SUDs and landscape to contribute to an urban cooling effect. The application is accompanied by a Sustainability Statement and Water Cycle Study. These set out a number of options regarding how the development could be designed to achieve the overall policy objectives around sustainability and climate change adaptation. There is however limited commitment at this stage to particular measures or features of the development to adapt to climate change. Whilst there are matters that could be incorporated at the detailed design stage, it would be helpful for greater certainty to be provided now (particularly as a number of these matters will overlap in respect of how zero carbon can be achieved). | Refer to Technical note dated 12.10.18 prepared by PBA. |
| Employment | Policy Bicester 1 requires that Economic Strategies be produced to support planning applications for eco town proposals demonstrating how access to work will be achieved including to deliver a minimum of one employment opportunity per new dwelling that is easily reached by walking, cycling and/ or public transport. This reflects the PPS requirement and this is also reflected within the NW Bicester SPD. The SPD also covers requirements around home working. The application is accompanied by an Economic Strategy within the Planning Statement; however the focus of this is upon financial benefits to the economy and the general contribution that new homes would bring in terms of additional workforce. This does not however meet the Policy requirement relating to how this site will contribute to the provision of employment opportunities to meet the overall aim that the site will ensure that unsustainable commuter trips are kept to a minimum. I am aware that the site is only allocated for housing; therefore it seems to me that the key will be commitment to providing opportunities for home working as well as the provision of good links through to other areas of the site where employment opportunities are available. An update to your economic strategy should be submitted to demonstrate how the application meets the policy requirements in this regard. In addition, the Council would look to secure construction apprenticeships through the S106 agreement and I note from appendix 2 of the planning statement that you agree that the inclusion of terms to secure an employment and skills training plan to target new apprenticeships would form part of the negotiations in respect of the S106. | Economic Statement Addendum dated June 2018 circulated to Cherwell on 10.09.18 |
| Transport | Oxfordshire County Council has raised an objection with regard to the proposal on Transport grounds. The main reasons for the objection relate to the TA providing insufficient information to fully assess the traffic impact of the development and that it does not provide sufficient information to assess the safety of the proposed accesses onto the B4100 – both the temporary construction access and the access to the allotments via the Home Farm access road. The view is also expressed that the site does not maximise opportunities for sustainable travel and in this regard more direct links with adjacent parcels and the residential streets therein is sought. I note you have seen the full OCC response therefore I do not intend to repeat their comments here but, as this letter aims to bring together all comments received, it is necessary for this letter to request the additional information sought.  In respect of access, this is a matter for approval now, however I am unclear on what access details are sought for approval now as there is no specific plan demonstrating these details (other than the plan for the junction from Charlotte Avenue, which I understand is already constructed). The Highway Authority has sought further detail in respect of the arrangements from the B4100 for the allotments and the parking.  In respect of the Highway Authority request for pedestrian connections to adjacent parcels, I support this as it is necessary to deliver a comprehensive development, to allow for a high level of permeability and to enhance the proposals to enable sustainable modes of transport to be the predominant choice. The Highway Authority has requested that additional connection points, particularly towards the current bus stops which are particularly important to ensure all properties are within a 400m walk of the bus stops.  The provision of a crossing point of the B4100 is seen as an important link to gain access to the Church of St Lawrence. The application notes this, and the Highway Authority consider that it is more appropriate for this to be directly delivered under S278 by this site. An initial feasibility assessment and indicative drawings are sought to enable further consideration of the opportunities in this location for a crossing. This matter can also be discussed further in respect of the S106 requirements for the site.  There are a number of S106 obligations sought towards offsite highway schemes that are required due to the cumulative impact of NW Bicester. These are detailed in the OCC response and in the Heads of Terms that I will separately forward. This includes a proportionate contribution towards the cost of the strategic infrastructure at NW Bicester including the realignment of the A4095 and the new tunnel under the railway. In the absence of the realigned infrastructure and tunnel, there is a restriction on the level of development that can be undertaken and this capacity has already been agreed elsewhere on the site (507 dwellings on land north of the railway line and 150 dwellings and a proportion of the commercial development on the Albion Land site south of the railway line. 500 dwellings have also been permitted at Himley Village given the work that was undertaken there to demonstrate that due to the timescales around delivery, this number could be permitted without causing severe harm). Grampian conditions to restrict development have been recommended for all development beyond that already agreed and this condition is necessary to avoid severe harm in transport terms. In respect to this site, I would be minded to recommend a Grampian condition to restrict the development so that it could not commence in advance of the completion of the new strategic infrastructure, unless there was agreement with regard to the site being part of the first 500 additional dwellings north of the railway line.  The achievement of modal shift, and therefore the incorporation of infrastructure to support sustainable modes of transport, are important to meet the targets for NW Bicester. OCC have made some comments in relation to the Travel Plan which must be addressed, however generally this Plan provides details of incentives that could be put in place or expanded that are positive in expanding sustainable transport options. | Refer to updated Transport Assessment (V1.4) dated October 2018 and Travel Plan (V1.4) dated October 2018 prepared by PBA |
| Landscape Impact and open space | Policy ESD13 of the Cherwell Local Plan Part 1 requires consideration of development proposals in terms of their impact upon local landscape character. Development is expected to respect and enhance local landscape character. Policy Bicester 1 includes a number of criteria relating to the landscape in terms of requiring a well-designed urban edge, which respects landscape setting and with the careful consideration of open space and structural planting to achieve an improvement in the landscape and visual impact of the site.  The application is accompanied by an LVIA and the Council’s Landscape Officer has raised a number of comments. I note your amended LVIA and this has been forwarded to the Landscape Officer for further comment.  The Landscape Officer has queried the location of the allotments and car parking and has advised that these will present visual harm to the character of the landscape setting. In my view, the treatment of this area will need to be carefully handled, but I am not averse to the position of this infrastructure as proposed given there is a dual purpose for the car parking in there being an arrangement for users of the Church of St Lawrence.  I would however agree with comments relating to the position of the play space within the landscape buffer and setting of the church. The play area should be positioned in a better integrated position so that it benefits from informal supervision and be illuminated by adjacent highway street lights. The play area is required to be a combined LEAP and LAP.  The information within the Tree Survey Report is noted and I also note that the majority of existing tree and hedgerow groups are to be retained other than where gaps are required to create access points through to the existing approved development at Elmsbrook. No information is provided regarding tree protection and exact details of tree work required therefore there would be the requirement for a planning condition to agree this prior to work commencing. | Refer to updated Parameter Plans revisions A.Response to landscaping and updated LVIA dated May 2018 also circulated to Cherwell on 25.05.18 |
| Water | At NW Bicester, there is an aspiration towards the achievement of water neutrality as set out within the NW Bicester SPD and the PPS for Eco Towns given it is known that Bicester is within an area of water stress. These documents and Policy Bicester 1 also require the development to be ambitious in terms of water efficiency and to improve water quality. The application is accompanied by a Water Cycle Strategy as required by Policy and water efficiency measures are also covered in the Sustainability Statement. It is noted that there is a commitment to meeting the higher water efficiency standard of 110 l/p/d and I would intend to condition that this standard is achieved. It is also noted that the use of a SUDs system can contribute towards improved water quality. However, this does not demonstrate how the site will contribute towards the aspiration for water neutrality for the NW Bicester site as the measures do not go beyond standards requirements for new development. Further details are sought on how water consumption can be further reduced. For example, on Elmsbrook, 80 l/p/d has been achieved by the inclusion of rainwater harvesting. | Refer to Technical note dated 12.10.18 prepared by PBA. |
| Flood Risk and drainage | The application is accompanied by a flood risk assessment as required by Planning Policy. This demonstrates that built development would be situated within flood zone 1 and therefore in an area at lower risk of flooding. Part of the site does however sit within flood zones 2/3. The Environment Agency have objected to the application advising that the FRA does not comply with the requirements set out in the Planning Practice Guidance to the NPPF and does not therefore provide a suitable basis for an assessment to be made of the flood risk arising from the proposed development. It is understood that the proposed development is in flood zone 1, however although there is no detailed modelling of the site, the JFlow model is an indication that there would be flooding on the site boundary. A greater explanation of the flood risk on the site is required in order to establish the level of flood risk in relation to the proposed built development. The Environment Agency seek an FRA which covers the deficiencies identified and which demonstrates that the development will not increase flood risk elsewhere and where possible reduces flood risk overall. The response advises that specifically, the FRA will need to demonstrate that the developed area of the site is not at risk of flooding, including an allowance for climate change.  The Landscape Officer has commented upon the engineered balancing pond which is seen as an unnatural feature in the landscape setting. Whilst I am aware this is not for approval at this stage, I would agree that any SUDs features will be required to be properly designed so as to be a natural feature, provide interest and amenity and be safe within an area of open space. | Refer to Technical note dated 12.10.18 prepared by PBA.Updated FRA dated August 2018 circulated to Cherwell on 10.09.18. |
| Design | There are numerous planning policies that require good design for new development and indeed good design is seen as a key aspect of sustainable development. At NW Bicester there has been an acceptance that sustainability has a key role to play in achieving high quality exemplary development. There is therefore a careful balance between development that meets the sustainability standards sought and being locally distinctive in terms of its relationship with the existing town of Bicester. The application is accompanied by a Design and Access Statement, which explains that the overall design rationale has been to follow the approach taken at Elmsbrook. Overall I am generally content with this design approach (subject to other matters being addressed – such as comments in respect to links and accessibility). The indicative layout is also generally positive in my view in demonstrating that a suitable development could be provided as part of the NW Bicester site and its position and relationship with Elmsbrook.  I have considered the design guidelines in respect of these being approved for use in later design work. Firstly, the particular guidelines for specific areas of the site make no reference to sustainability (including orientation to aid PV and for example the impact this would have on roof form) in considering the design. This is covered elsewhere within the DAS, but I have some concern that this isn’t covered within the specific guidelines for design. In addition, I have some concern regarding the carriageway guidance in particular the tree lined avenue. The carriageway width is accepted by OCC but they have advised that 2m footways should be provided to prioritise sustainable travel. In addition, a key character proposed is the inclusion of trees. Sufficient space would need to be provided to allow trees (and the type of tree may guide the space required), services and other features (including any SUDs features if they were deemed necessary) to be provided. The Landscape Officer has advised that trees on the north side will overshadow dwellings and cause reduced light levels to windows and front gardens. It has been suggested that the verge to the southern side of the street is widened to 3m and trees planted there. Trees might contribute to addressing some issues of overheating if carefully located but it is important at this stage to consider the role and purpose of tree planting and make sufficient allowance for the space they will require. There have been some issues on Elmsbrook in terms of the relationship between trees (and their required pits), services and street lighting in fitting within the space available. It would be disappointing for insufficient space to be provided that could prejudice the inclusion of trees at a later stage if this is an important feature in the character proposed at this stage. The type of tree would also need consideration to ensure that it is managed so as not to obscure the sightline towards the Church of St Lawrence given this is an important design feature in terms of the impact upon this heritage asset. The Landscape Officer has raised similar concerns and has requested a more accurate visual representation of the framed view of the church in respect of highway corridor depth and trees of project growth pattern of 25 years or more as he has some concern that the church will be obscured by tree canopies.  My other thought relates to the proposal for a ‘hard edge’ including 900mm walls along the tree lined avenue. This may be appropriate between dwellings but I am concerned that this indicates a rather harsh edge if it is proposed the whole way along this frontage. I also note that the height of buildings along the whole of the main route is up to 13m. I feel that this is rather high on this site where I would have expected the development to reduce in height where development extends towards the open countryside. I am not averse to a greater height in this area but the height quoted seems rather high. In respect of heights, I note that the LVIA refers to heights of 8m and 13m but the parameter plan refers to heights of 8.5m and 13m.  The Strategic Environmental Report for NW Bicester identifies that two of the existing farm tracks leading from Home Farm have been preserved in the design ensuring the continuation of historic routeways. It identifies that this design has ensured that the historic landscape of the area remains visible despite the change in the character of the area from farmland to a residential and mixed use development. Are you able to confirm how this has been taken into account in the design of this proposal? In addition, I tend to agree with the Landscape Officer who has advised that the LEAP/LAP play area is sited inappropriately within the landscape buffer and setting of the church. We would look for a more integrated design approach where the play space is located more closely to the proposed housing and which would by its nature be safer in terms of informal supervision. | Refer to updated parameter plans (rev A) and updated DAS. |
| Heritage | S66 of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 requires the Local Planning Authority to have regard to the desirability of preserving a listed building or its setting. Planning Policy in the NPPF and Policy ESD15 of the Cherwell Local Plan Part 1 expects development to conserve, sustain and enhance designated and non-designated heritage assets. The Eco Towns PPS confirms that Eco Town proposals should set out measures to conserve and, where appropriate, enhance heritage both assets and their settings through the proposed development. The NW Bicester SPD identifies the listed buildings within the site including Home Farm House and it also identifies St Lawrence’s Church as an important local landmark building with its setting important in the local landscape.  In terms of built heritage the submitted assessment and EIA identifies the listed buildings within proximity to the church and also Caversfield House as an important non designated heritage asset. The rural setting of the assets is identified but the changes that have taken place are noted. The Strategic Environmental Report, guiding the Masterplan for NW Bicester identified the need for a buffer to Home Farm and the Church and it recommended lines of sight to and from St Lawrence’s Church to a small wooded area be provided for, continuing those provided during the design of the Exemplar site. It identifies that this would significantly lessen the impact of the development of this area on this asset. It is noted from the heritage assessment and indicative layout that a sightline from the western corner of the site as an avenue arrangement can be provided for towards St Lawrence’s Church. A large area of open space is also provided to continue separation between development on the site and the heritage assets. In terms of the parameter plans, the access and movement parameter plan identifies a residential avenue but the Land Use parameter plan does not demonstrate this sightline. In my view, whilst there are commitments to provide this, the Land Use parameter plan should be updated to include this sightline so that this is a clear parameter that must be worked within when future reserved matters are being negotiated as this is an important feature in mitigation of impacts. The built heritage assessment concludes, and I would agree that there would be some harm by way of developing this land and that this is less than substantial harm in terms of the NPPF. This then requires harm to be balanced against public benefits.  The Strategic Environmental Report identified that on the Exemplar site, the buildings closest to St Lawrence’s Church and Caversfield House would be constructed in styles to blend in well with the local buildings and to be finished in either brick or stone. Stone would help to connect the new development to the existing historic buildings and allow for a coherent sense of place due to the similarity in building material and colour between the historic buildings and the new development. There is no commitment as part of this application other than a general statement that the development would be designed to be sympathetic to the local materials and style. Given previous conclusions in respect of development that would be appropriate on the edge of the site adjacent to heritage assets in terms of form and materials, it would be helpful for this proposal to identify similar mitigation and commit to this again to ensure that such commitments can be the basis for future negotiation of reserved matters.  In respect of archaeology, the NW Bicester SPD confirms that the site has known potential for remains dating from the prehistoric period and this is included within the Strategic Environmental Report for the wider site. You have submitted an Archaeological Desk Based Assessment and this has been reviewed by the Oxfordshire County Council Archaeologist. The conclusion is that the submitted assessment fails to appropriately assess the archaeological potential of the site and that it does not meet the requirements of the NPPF at paragraph 128. It is also advised that the development is likely to have an impact on both known and previously unidentified archaeological features and there is currently insufficient information on the significance of these impacts on these features. A programme of archaeological investigation is required ahead of the determination of any planning application. You have seen the full response and therefore the full justification for this request and I understand that additional work is underway to respond to the current objection. Please also consider the implications upon the EIA in respect of the conclusions of the archaeological investigation. | Refer to updated Archaeological Desk-Based Assessment dated September 2018 circulated to Cherwell on 20.09.18 |