

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

District: Cherwell

Application No: 18/00825/HYBRID-3

Proposal: Demolition of buildings and structures as listed in Schedule 1; Outline planning permission for up to 1,175 new dwellings (Class C3); 60 close care dwellings (Class C2/C3); 929 m2 of retail (Class A1); 670 m2 comprising a new medical centre (Class D1); 35,175 m2 of new employment buildings, (comprising up to 6,330 m2 Class B1a, 13,635 m2 B1b/c, 9,250 m2 Class B2, and 5,960 m2 B8); 2.4 ha site for a new school (Class D1); 925 m2 of community use buildings (Class D2); and 515 m2 of indoor sports, if provided on-site (Class D2); 30m in height observation tower with zip-wire with ancillary visitor facilities of up to 100 m2 (Class D1/A1/A3); 1,000 m2 energy facility/infrastructure with a stack height of up to 24m (sui generis); 2,520 m2 additional education facilities (buildings and associated external infrastructure) at Buildings 73, 74 and 583 for education use (Class D1); creation of areas of Open Space, Sports Facilities, Public Park and other green infrastructure; Change of Use of the following buildings and areas: Buildings 357 and 370 for office use (Class B1a); Buildings 3036, 3037, 3038, 3039, 3040, 3041, and 3042 for employment use (Class B1b/c, B2, B8); Buildings 217, 3102, 3136, 3052, 3053, 3054, and 3055 for employment use (Class B8); Buildings 2010, 3008, and 3009 for filming and heritage activities (Sui Generis/Class D1); Buildings 2004, 2005 and 2006 for education use (Class D1); Buildings 366, 391, 1368, 1443, 2007, 2008 and 2009 (Class D1/D2 with ancillary A1-A5 use); Building 340 (Class D1, D2, A3); 20.3ha of hardstanding for car processing (Sui Generis); and 76.6ha for filming activities (Sui Generis); the continuation of use of areas, buildings and structures already benefiting from previous planning permissions, as specified in Schedule 2; associated infrastructure works including surface water attenuation provision and upgrading Chilgrove Drive and the junction with Camp Road

Location: Heyford Park Camp Road Upper Heyford

Response date: 14th August 2020

This report sets out the officer views of Oxfordshire County Council (OCC) on the above proposal. These are set out by individual service area/technical discipline and include details of any planning conditions or informatives that should be attached in the event that permission is granted and any obligations to be secured by way of a S106 agreement. Where considered appropriate, an overarching strategic commentary is also included. If the local County Council member has provided comments on the application these are provided as a separate attachment.

Assessment Criteria
Proposal overview and mix/population generation

OCC's response is based on a development as set out in the table below.

Residential	No.
1-bed dwellings	164
2-bed dwellings	304
3-bed dwellings	504
4-bed & larger dwellings	203
Close Care Dwellings (Class C2/C3)	60
Extra Care Housing	
Affordable Housing %	35%
Commercial – use class	m²
A1	929
B1	19,965
B2/B8	15,210
Development to be built out and occupied out over	10 years

Based on the completion and occupation of the development as stated above it is estimated that the proposal will generate the population stated below:

Average Population	2766
Primary pupils	294
Secondary pupils	213
Sixth Form pupils	35
SEN pupils	6.1
Nursery children (number of 2 and 3 year olds entitled to funded places)	41.2
20 - 64 year olds	1540
65+ year olds (figure includes Close Care Dwellings)	425
0 – 4 year olds	147

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Strategic Comments

OCC support the principle of this masterplan application and the delivery of Local Plan Policy Villages 5: Former RAF Upper Heyford. Funding from the Oxfordshire Housing & Growth Deal has been released to design and help to deliver the major works required at Junction 10. However, further work is required to overcome the technical transport, education and ecology objections. In summary:

- There is a transport objection detailed in the officer response below.
- There is an education objection as details of the proposed primary school site are still to be agreed.
- There is an ecology objection as the submitted amendments do not alter our original comments.

There are also comments from Lead Local Flood Authority.

OCC is committed to working with the applicant and CDC to resolve these outstanding issues.

Officer's Name: Jonathan Wellstead

Officer's Title: Senior Planner

Date: 14/08/20

Application no: 18/00825/HYBRID-3

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General Information and Advice

Recommendations for approval contrary to OCC objection:

IF within this response an OCC officer has raised an objection but the Local Planning Authority are still minded to recommend approval, OCC would be grateful for notification (via planningconsultations@oxfordshire.gov.uk) as to why material consideration outweigh OCC's objections, and given an opportunity to make further representations.

Outline applications and contributions

The number and type of dwellings and/or the floor space may be set by the developer at the time of application, or if not stated in the application, a policy compliant mix will be used for assessment of the impact and mitigation in the form of s106 contributions. These are set out on the first page of this response.

In the case of outline applications, once the unit mix/floor space is confirmed by the developer a matrix (if appropriate) will be applied to assess any increase in contributions payable. The matrix will be based on an assumed policy compliant mix as if not agreed during the s106 negotiations.

Where unit mix is established prior to commencement of development, the matrix sum can be fixed based on the supplied mix (with scope for higher contribution if there is a revised reserved matters approval).

Where a S106/Planning Obligation is required:

- **Index Linked** – in order to maintain the real value of s106 contributions, contributions will be index linked. Base values and the index to be applied are set out in the Schedules to this response.
- **Security of payment for deferred contributions** – An approved **bond** will be required to secure payments where the payment of S106 contributions (in aggregate) have been agreed to be deferred to post implementation and the total County contributions for the development exceed £1m (after indexation).
- **Administration and Monitoring Fee - TBC**
This is an estimate of the amount required to cover the extra monitoring and administration associated with the S106 agreement. The final amount will be based on the OCC's scale of fees and will adjusted to take account of the number of obligations and the complexity of the S106 agreement.
- **OCC Legal Fees** The applicant will be required to pay OCC's legal fees in relation to legal agreements. Please note the fees apply whether an s106 agreement is completed or not.

CIL Regulation 123

Due to pooling constraints for local authorities set out in Regulation 123 of the Community Infrastructure Levy Regulations 2010 (as amended), OCC may choose not to seek contributions set out in this response during the s106 drafting and negotiation.

That decision is taken either because:

- OCC considers that to do so it would breach the limit of 5 obligations to that infrastructure type or that infrastructure project or
- OCC considers that it is appropriate to reserve the ability to seek contributions to that infrastructure type or that infrastructure project in relation to the impacts of another proposal.

The district planning authority should however, take into account the whole impact of the proposed development on the county infrastructure, and the lack of mitigation in making its decision.

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Location: Heyford Park Camp Road Upper Heyford

Transport Schedule

Recommendation

Objection

If the LPA is minded to approve, OCC requires prior to the issuing of planning permission a S106 agreement including an obligation to enter into S278 agreements and S38 agreement(s) to mitigate the impact of the development plus planning conditions and informatives as detailed below.

S106 Contributions

Contribution	Amount £	Price base	Index	Towards (details)
Highway works – strategic highway contribution	Circa £4 million (capped – actual amount payable on final accounts)	July 2020	Baxter	Works at M40, J10. Specifically, mitigation schemes at Baynards Green and Padbury junctions.
Public transport services	£2,189,170	August 2019	RPI-x	New bus service between Heyford Park and Bicester. (Note: the amount in our previous response was incorrect).
Public transport infrastructure (<i>not dealt with under S278/S38 agreement</i>)	£115,398	August 2019	Baxter	Bus stops at six locations on new bus service route at Heyford Park. To include shelters, seating and timetable information.*
Travel Plan Monitoring	To be confirmed when the number of Travel Plans is known.	To be confirmed	RPI-x	For site-wide framework travel plan and commercial Travel Plans. Commercial sites that are of a size above the travel plan threshold will have their own Travel Plan in line with the Framework Travel Plan and the County's Travel Plan guidance.
Village traffic calming	£375,000 comprising £50,000 each for:	July 2020	Baxter	Traffic mitigation measures in the affected villages

	Fritwell Ardley Somerton North Aston Chesterton Middleton Stoney Lower Heyford plus £25,000 for Bucknell			
Safety improvements at the junction of North Aston Road and the A4260	TBC	TBC		Safety improvements to include speed limit reduction, signage, road markings and/or upgrade of safety camera
Total				

,* Bus shelter costs are based on standard OCC bus stops – if higher specification stops are required for heritage reasons this will need to be reviewed.

The S106 agreement will also need to include obligations related to:

- Occupations based triggers for highway works – no proposal has yet been received.
- Construction and opening of on-site bus route and access to the new school
- Requirements for HGV operational traffic routing agreements
- Travel plan measures and monitoring

Key points

To date our points of objection have been addressed as follows:

Footway on Camp Road.

Following a site visit I advised that, whereas any footway on the northern side of the link road would be too narrow to be acceptable, a footway of adequate width was, in my opinion, feasible on the south side. Following further investigation, the applicant has provided (email dated 15 July) a drawing (Woods Hardwick SK345E RevE) showing the footway crossing from north to south, east of the 'Pye Homes' site, to connect with the proposed crossing as part of the new junction with Chilgrove Drive. This connection will need to be made by the developer prior to first occupation of any residential or employment parcels accessed via Chilgrove Drive. (A footway connection between the existing footway on Camp Road to the west, and any further residential properties accessed from Camp Road east, must be made prior to first occupation of those dwellings).

The crossing point is proposed to be on a narrowing. Given the likely traffic volumes, I would like to see this formalised as a zebra crossing.

There is insufficient space to provide off carriageway cycle facilities, so further consideration in the design will need to be given to accommodating cyclists safely on the carriageway.

A revised drawing is requested.

Impact of secondary commercial access

Since our previous response, we have sought clarification about the proposed 'secondary commercial access' in the Trident Roads area. It has been confirmed that this is proposed to be a permanent access to a limited number of units, and that access would be from the bus route. Based on the agreed design of the Trident Roads area, this would not be acceptable, due to the restricted geometry (as demonstrated by vehicle swept path analysis provided by the applicant), and in particular the junction with 'Road 7'.

For this to be acceptable as an HGV route, the junction will need to be redesigned, to provide for improved forward visibility, to avoid the need for HGVs to mount the footway to avoid other vehicles. Drivers on the western arm need to be able to make eye contact with drivers on the eastern arm before moving forward into the junction. Particular consideration will need to be given to how to mark the junction if necessary to indicate priority. Ideally Road 7 should have priority, as a primary walking and cycling route. **Given the constraints of the site, this needs to remain a point of objection until it is resolved, and should not be left to condition.**

Traffic impacts on villages.

To address our comments that the impact of the development on villages had not been updated using the new modelling methodology, and that the impact of traffic diverted by the Middleton Stoney proposed mitigation had not been assessed, a technical note, TN035 Rev C, has been submitted. The report confirms that the model is acceptable for this purpose, and sets out the results from running the model. The assessment is based on peak hour traffic, as the assumed worst case.

Whilst I am satisfied with the methodology, and that the outputs are a reasonable prediction of the impact of the development on a 2031 reference case, with and without the proposed restrictions at Middleton Stoney, the use of a strategic model can generate some results that are hard to understand. In this case, the model is forecasting a reduction in traffic through Lower Heyford, partly as a result of non-development through traffic re-routing away from congested junctions, and partly because of the pattern of development (jobs and homes) changing over the next ten years, which would in turn change travel origin-destination patterns.

There is of course a risk of the pattern of development not changing as forecast, in which case Lower Heyford would be unlikely to see the forecast reduction. However, once the proposed restrictions at Middleton Stoney went ahead, there would be a reduction in traffic through the village. In the intervening years, however, the village would continue to see an increase in traffic until the development, and employment in Bicester, reached the critical mass required to change travel patterns sufficiently.

I therefore recommend that, notwithstanding the modelling results, a contribution towards some form of mitigation for Lower Heyford should be sought from this development.

TN035 Rev C sets out the proportionate impact in terms of peak hour traffic, comparing the 'Do nothing' scenario (reference case plus development but none of the mitigation), and the 'Do Something 1' scenario (reference case plus development, with the mitigation package), with the 2031 reference case. The summary is set out in Table 2.

Taking each of the villages considered in turn:

Fritwell: significant, particularly in the am peak, with or without the mitigation package. The report recommends contribution towards traffic mitigation measures, which I support.

Ardley: significant, particularly in the pm peak, and note that Ardley Road % would be greater. The TN recommends traffic mitigation measures, in addition to the new proposed signalised junction, which I support.

Bucknell: significant, particularly in the pm peak. However, the TN does not recommend a contribution for traffic calming, due to the benefit that the village will receive from the signalling of the junction at Ardley. This benefit would not mitigate the impact of traffic passing through the village, however, and therefore a contribution should be sought for traffic mitigation in the village. A scheme has previously been identified in connection with further development north of the railway at NW Bicester. It is recommended that a contribution is made towards this scheme, sharing the cost with future development at NW Bicester.

Middleton Stoney: The TN shows the impact of the proposed mitigation restrictions would be a very significant increase in traffic on the northern arm of the junction, balancing the reduction on the western arm. It concludes that the mitigation measures proposed already are sufficient and that no further mitigation measures are required. However, these have little benefit for the northern arm and therefore I recommend that additional traffic mitigation measures are secured, either through a contribution or additional S278 works, taking into account suggestions from the Parish Council (some of which were set out in our previous response).

Kirtlington: The TN shows that the impacts are modest, even with the restrictions in place at Middleton Stoney, and therefore I agree with the conclusion that mitigation is not required.

The Bartons: The TN predicts a modest increase, and a reduction with the development mitigation package in place, therefore I agree with the conclusion that mitigation is not required.

North Aston and Somerton: The TN predicts a significant increase, both with and without the mitigation package, and I agree with the conclusion that mitigation should be provided.

Upper Heyford: The TN predicts a significant increase and recommends mitigation. It should be noted that a contribution towards traffic mitigation in Upper Heyford was secured on the Phase 9 planning permission (which is part of the PV5 masterplan), so no further mitigation is necessary.

Caulcott: The TN predicts a reduction in traffic as a result of the development, with or without the restrictions at Middleton Stoney. This is more marked than at Lower Heyford. I agree with the conclusion that mitigation is not required.

Chesterton: The TN predicts a significant increase in traffic through the village, with and without the restrictions at Middleton Stoney. However, it concludes that the impact is acceptable because it is an A Class Road. The fact that it is an A class road does not make the impact any less – this is still a village with frontages close to the road - and in my opinion the level of impact warrants a contribution for traffic mitigation.

OCC costings of an example traffic calming scheme carried out for Lower Heyford PC have indicated that £50,000 would be needed even for a modest traffic calming scheme, for example comprising three build-outs. Therefore, while it is not possible to specify a scheme at present, the sum of £50,000 is required towards traffic calming in each of the villages where there is a significant impact. The exceptions to this are Bucknell, where funding will also be sought from North West Bicester, and so a smaller contribution of £25,000 is sought, and Middleton Stoney, where additional works could be secured as part of the overall mitigation scheme.

The modelling has highlighted that there will be a significant impact in turning movements at the junction of the A4260/North Aston Road. Whilst there would be sufficient capacity, based on accident records, OCC has concerns about the number of accidents at this junction in comparison with other similar junctions on the network. The increase in turning movements would exacerbate this risk, and therefore a contribution should also be sought towards safety improvements at this junction, which would include a reduction in the speed limit, improving the signage and road markings and potentially upgrading the safety camera.

Trip generation from leisure uses

In the absence of any different information from the LPA on the likely level of usage of the leisure facilities at the site, we accept that the trip generation is not likely to be significant impact in the peak hours.

Travel Plan

A draft travel plan has been received (My Mode Choice, ref 20-307-20 Revision 00 dated 12 June 2020.) The travel plan sets out very stretching targets to meet the modal shares required to meet the levels required in the transport strategy for the development, in order to provide adequate mitigation for the traffic impacts of the

development. The car driver share target is to reduce from 76.6% to 56%, which is a very substantial reduction.

We are reasonably confident that there is potential for a travel plan to achieve this, and there is a good range of measures proposed in the document. However, further detail is required to establish sufficient input on the proposed measures, and we are concerned that the financial commitment set out in section 11.5 may not be sufficient.

Our position is that although the travel plan does need improvement and refinement, it is not a reason for objection. We have provided detailed comments to the applicant on how it needs to be improved, and we require the final version to be appended to the S106 agreement. The S106 agreement itself will need to ensure that sufficient funds are put aside to enable it to be delivered.

Active modes and public rights of way

Figure 5.1 has been updated.

The routes to Upper and Lower Heyford are now marked 'Suggested on road Cycle Route to

Fig 5.1 should also be updated to include required public rights of way as discussed:

The plan does not show an acceptable route for the connection of Aves Ditch, which is a requirement of the current consent. There has been much discussion of the preferred route, and it is my understanding that the route below has been agreed (shown yellow in Fig 1), which is as per the 2012 agreement in principle, cutting across the 'nib' and including a stub to the Ardley railway bridge connection point. OCC would accept this not crossing the nib, provided the path in fig 3 below is provided, as that will provide PRoW users' experience of crossing the runway.

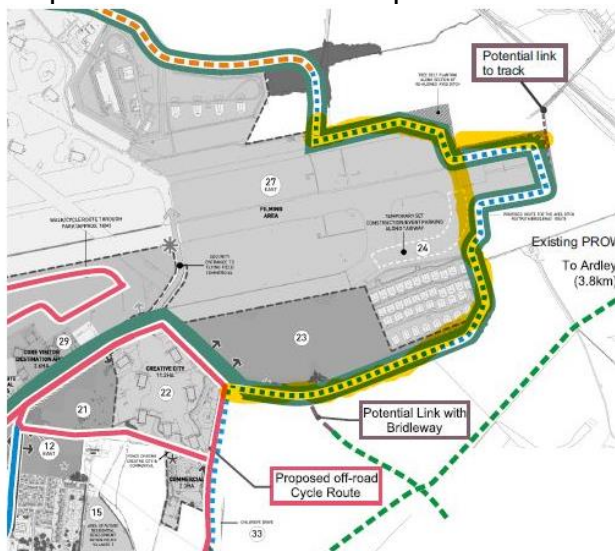


Fig 1 – Aves Ditch connection

There should also be an additional walking link from Parcel 23 to Flying Field Park, shown yellow in Fig 2. This will benefit residents of parcel 23 and other Heyford Park residents and visitors.

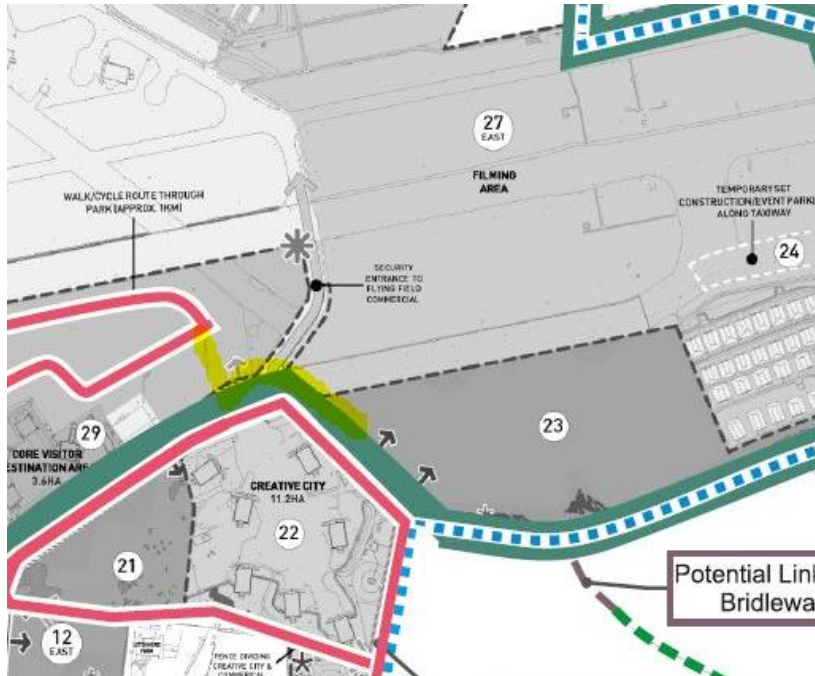


Fig 2: Walking link from Parcel 23 to Flying Field Park

There should also be an internal walk and cycle route (no need to be a bridleway) north of parcel 23 across the runway and then east to connect with Aves Ditch connection, as shown yellow in Fig 3. This will also benefit residents of parcel 23 and other Heyford Park residents and visitors.

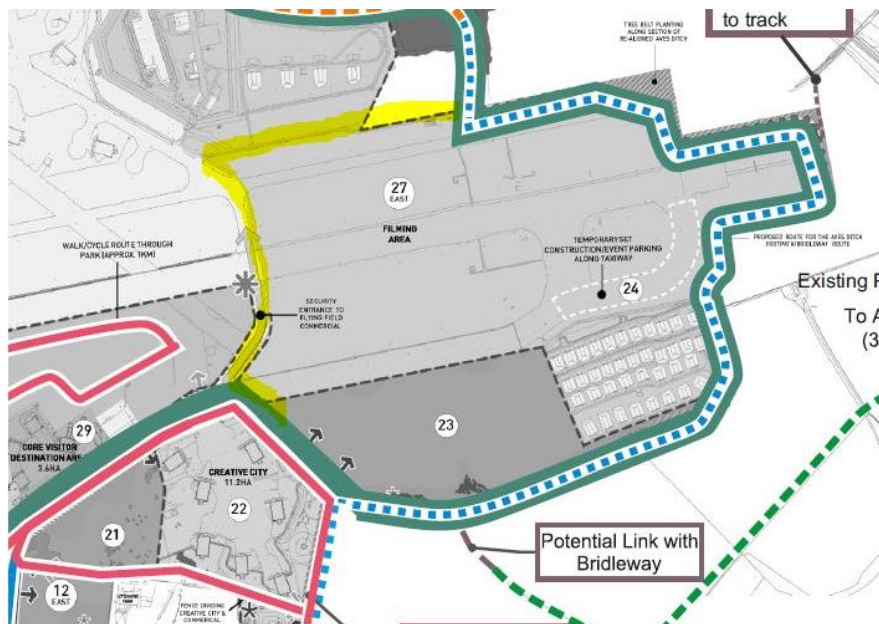


Fig 3

There should additionally be a bridleway link in the field north of the road to Ardley Road (in a strip of land owned by Dorchester Group), as shown yellow in Fig 4. This will provide a bridleway link to the wider PRow network to the east and towards Bicester, and is a required off site PRow improvement due to the scale of the development.



Fig 4

Off site highways

The developer has agreed to provide crossing facilities, including for equestrians, as part of the proposed highway works at Junction 5 – Ardley Road/Unnamed road. A revised drawing is requested.

As stated in our previous response, triggers for the completion of these schemes need to be proposed and agreed for the purposes of the S106 agreement.

M40 Junction 10

It is noted that Highways England has removed its objection subject to the S106 agreement setting a limit on development that can come forward prior to the J10 improvement works (Padbury and Baynards Green Roundabout works) being complete, at a quantum for each land use in sqm defined by the formula

$$\text{Total trips} = (\text{'Amount of resi'} * 0.588) + (((\text{'Amount of B1a'} / 11) + (\text{'Amount of B1b'} \text{ or } \text{B1c'} / 40) + (\text{'Amount of B2'} / 36) + (\text{'Amount of B8'} / 70)) * 0.406)$$

Where total trips = 1163

This allows flexibility in the make up of development that can come forward prior to the scheme, and is supported by the Highway Authority, who will seek this covenant in the S106 agreement.

I have been seeking cost estimates for the M40 J10 scheme in order to support OCC's request for a contribution towards the scheme. I understand it will be mid to end September 2020 before HE are able to submit a full revised costing for the scheme. However, based on the most recent estimates we are now confident that £4 million would cover the cost of the Padbury Roundabout element of the scheme at 2022 prices. However, the costs could come down. I suggest that the S106 agreement should include a requirement for a capped contribution of £4 million (index linked), but that the actual amount paid would be based on final accounts for

the scheme. We would seek for contribution instalments relatively early in the development, with an adjustment following the final accounts.

I have explored with the project team the possibility of an obligation on Dorchester to deliver the Padbury scheme, as opposed to making a contribution. However, this would be uneconomical and impractical for the following reasons

- 1) The original Strategic Outline Business Case (**SOBC**) prepared by HE as part of their Road Improvement Scheme (RIS) programme proposed a single scheme of four roundabouts, which following further transport modelling exercises was reduced to two roundabouts: Baynards Green and Padbury roundabouts and excluded Cherwell and Ardley Roundabouts from the scope.
- 2) HE has always treated the scheme as one scheme to reduce costs (surveys, designs, traffic management, staffing, construction and other overheads)
- 3) It is also in OCC's interest to deliver both roundabouts as one scheme through HE's supply chain to avoid delays in procurement of design and works.
- 4) An OBC and exemption report has already been approved to procure works through HE.
- 5) It was agreed by OCC's Senior Management that procuring works through HE via **a funding agreement** would save OCC significant costs (i.e. no costs for Feasibility Stage, No costs for procuring a contractor other than HE) and delivery time.
- 6) If DLL were to provide works at Padbury Roundabout, they would still require to work under HE's supervision meeting their design and other corporate requirements, including technical approval of design and works. This could delay the delivery of Padbury roundabout
- 7) If DLL were to provide works, their contractor would need to coordinate and cooperate with HE's contractor working on Baynards Green roundabout and this could cause conflict and delays in completion of works.
- 8) Separate works would also cause a lot of confusion and accuracy issues in the final accounting process to justify how GD funding is spent.

Officer's Name: Joy White

Officer's Title: Principal Transport Planner

Date: 21/07/2020

Application no: 18/00825/HYBRID-3

Location: Heyford Park Camp Road Upper Heyford

Lead Local Flood Authority

Recommendation:

No objection subject to conditions

Key issues:

As per below conditions

Conditions:

Strategic Surface Water Management Scheme:

Prior to the approval of the first reserved matters, a detailed Strategic Surface Water Management Scheme for the site, in accordance with the following documents and drawings, shall be submitted to, and approved in writing by the Local Planning Authority:

Heyford Masterplan description of development FINAL 30.06.2020 (3)
HPH-HYD-XXX-XX-RP-D-0001_P2-S2 Drainage Response
HPH-HYD-XXX-XX-RP-D-5001_P5-S2 Full

The scheme shall include:

- Evidence that the proposed flows from the site will be restricted to 4.5l/s/ha for all events up to and including the 1% AEP + 40% climate change event; to be demonstrated as greenfield run-off rate in Qmed, l/s, for each parcel
- Details of how the drainage scheme has been designed to incorporate SuDS techniques to manage water quantity and maintain water quality as set out in the FRA, and in accordance with adopted policy and best practice guidance including the SuDS Manual C753;
- Detailed drainage plan showing the location of the proposed SuDS features;
- Detailed cross sections and construction details of the proposed SuDS measures;
- Details of how the scheme shall be maintained and managed after completion;
- Details of how water quality shall be maintained during and after construction;
- Detailed drainage calculations, using FEH methodology, for all rainfall events up to and including the 1 in 100 year plus climate change event to demonstrate that all SuDS features can cater for the critical storm event

- for its lifetime;
- SuDS source control and infiltration techniques must be used wherever possible. Infiltration tests to be undertaken to BRE365. Where this methodology is not used full justification must be provided as to why this is.
- The submission of evidence relating to accepted outfalls from the site, particularly from any third-party network owners; and
- Sequencing for implementation
- The scheme shall be implemented in accordance with the approved details and timetable.

Reason:

To ensure development does not increase the risk of flooding elsewhere; in accordance with Paragraph 155 of the National Planning Policy Framework (NPPF) and Local and National Standards.

Surface Water Management Scheme (Phases):

Prior to the approval of any related reserved matters, a detailed Surface Water Management Scheme for each phase or sub-phase of development, shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall be in accordance with the details approved as part of the strategic scheme (**Strategic Surface Water Management Scheme**) and include all supporting information as listed in the Condition.

The scheme shall be implemented in accordance with the approved details and timetable.

Reason:

To ensure development does not increase the risk of flooding elsewhere; in accordance with Paragraph 155 of the National Planning Policy Framework (NPPF) and Local and National Standards.

Completion and Maintenance of Sustainable Drainage – Shown on Approved Plans:

No building or use hereby permitted shall be occupied or the use commenced until the sustainable drainage scheme for this site has been completed in accordance with the submitted details. The sustainable drainage scheme shall be managed and maintained thereafter in perpetuity in accordance with the agreed management and maintenance plan, (including contact details of any management company).

SuDS Features and Drainage Maintenance Plan (Detailed maintenance management plan in accordance with Section 32 of CIRIA C753 including maintenance schedules for each drainage element, to be prepared and submitted as stand-alone document)

Prior to occupation an Independent SuDS review, for each phase, shall be undertaken to ensure the constructed drainage features conform with the approved detailed design submission. The independent review report shall be submitted to the LPA and LLFA.

Reason:

To ensure that the principles of sustainable drainage are incorporated into this proposal and maintained thereafter.

To ensure the SuDS drainage features have been constructed in accordance with the approved plans.

SuDS – Design Documentation Plans:

Prior to occupation, a record of the approved SuDS details shall be submitted to and approved in writing by the Local Planning Authority for deposit in the Lead Local Flood Authority Asset Register. The details shall include:

As built plans in both .pdf and .shp file format;

Photographs to document each key stage of the drainage system when installed on site;

Photographs to document the completed installation of the drainage structures on site.

Reason:

In accordance with section 21 of the Flood and Water Management Act 2010.

Detailed comments:

As per the above listed conditions.

Officer's Name: Adam Littler

Officer's Title: Drainage Engineer

Date: 30/07/2020

Application no: 18/00825/HYBRID-3

Location: Heyford Park Camp Road Upper Heyford

Community Infrastructure Schedule

All OCC's concerns remain. I reiterate my concerns about the school site within the application as follows:

The requirement is for a 2 Form Entry Primary School Site. OCC have design criteria, location requirements and processes for delivering an appropriate educational site provision, the details of which are clearly set out within the OCC documents listed below and to be issued with our response:

- Design criteria for primary school sites
- Information required to assess the suitability of a school site
- S106 Education Check list
- Model SoA for OCC Primary Schools

Where an application requiring a school site is submitted there will be no objection where it can be fully demonstrated that OCC requirements above have been met.

These documents, produced by Oxfordshire County Council, set out the minimum provision for ensuring that a satisfactory establishment, for the delivery of pupil places, can be achieved both now and in the future, ensuring that the site has the long-term flexibility to continue to meet educational need.

The documents, within this application, along with the further document issued (design update May 2020 REVA) do not give the comfort required by the Authority, that the educational need could be met, as set out above. As a consequence, Oxfordshire County Council object to this planning application on the following grounds:

The headline is that even the basic unsubstantiated design scheme for the school, proposed by the developer, sits outside of the proposed restricted 'building area' thus demonstrating that the school could not successfully be located on the proposed site.

- **Restriction to the floor space of school building**

The arbitrary restriction, of 2,415m², for the school building floor space does not meet OCC's minimum building area for a 2FE primary school site. Although the development site only generates 1.5 FE the County Council's policy requires a 2FE sites and as such the site area must accommodate the commensurate building area for the future. See attached OCC Building Area guidelines as ratified by cabinet for a 2FE primary school.

Further, limiting building area at this stage, restricts the real need for a school site to be flexible, both now and in the future. Currently, it directly prevents a 2FE school from being constructed but further restricts the long-term sustainability of the school and

could hamper OCC's flexibility in carrying out their statutory duty to provide pupil places.

To ensure OCC have the long-term flexibility for the provision of pupil places, the site cannot be restricted from the potential for temporary classrooms and/or future expansion

Given the above the following would need to be agreed with English Heritage and the District

a) English Heritage/District to accept the removal of the restriction to the floor space of the school building

- **Restricted area in which the school building can be built**

The building area restriction, to a constrained and contorted area, as demonstrated below cannot be accepted. There is no guarantee that the building could successfully be manipulated into this precise area.



At this stage, given the 'building area' restriction demonstrated above, there is no way of knowing if there is any possibility of the basic Government design standards being met particularly for daylighting, ventilation, overheating, safeguarding etc if the building is to be constrained within such a contorted and restricted area. **Certainly, the Developer has already proved, with their own sketch scheme (design update May 2020 REVA), as attached, that the building cannot fit within this restriction.**

Given the above the following would need to be agreed with English Heritage and the District.

a) English Heritage/District to accept the removal of the building area restriction to ensure that the school can be built in line with government standards and that the school can be extended in the future

The restricted area is further exacerbated by levels changes. See below.

- **Levels**

The developers suggested amendments to the current levels within **design update May 2020 REVA** demonstrate how the levels outside of the site will fall into a 'gutter' against the school fence, on three sides. This will create an unsightly rat run / garbage trap over which the school would have to look out onto and would have no control over.

Further the level change within the supposed 'building zone' of up to 1.5m between the front of the site, across the 'building area', to the retained hanger have also been demonstrated to further reduce the 'building zone' by the creation of retaining walls and/or embankments.

Given the above level changes the following would need to be agreed with English Heritage

- a) English Heritage/District to accept retaining walls where reduced levels are proposed which are to be maintained by the developer in perpetuity
- b) English Heritage/District to accept retaining walls to the runway, west boundary and around the hanger (which are to be maintained by the developer in perpetuity) in order to create a level building plateau. This is to ensure that level access can be maintained to all building entrances, the building can be extended and that no child is disadvantaged by having to travel on an alternative route to their friends or is restricted from accessing any area of the school site.

- **Shape of school site**

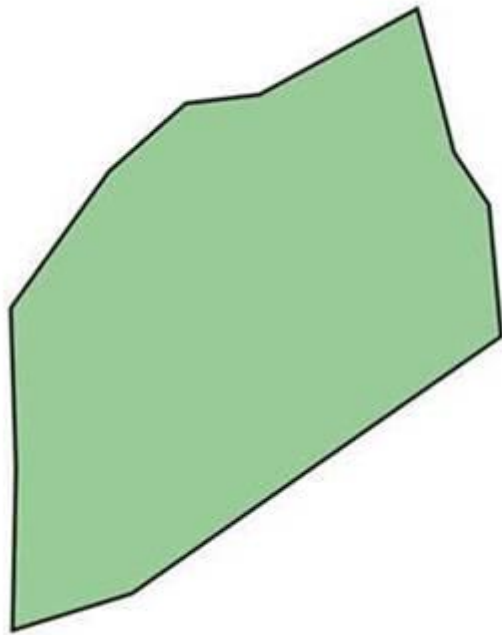
It has not been demonstrated that the proposed shape of the school site is conducive to the creation of an economic laying out for the school or to provide the minimum external play areas requirements. The current shape doesn't appear to fit the basic OCC playing field requirements without further compromising the other areas of the site.

A distorted playing fields provision would not be accepted with its potential to compromising the delivery of a team games playing field to meet curriculum requirements.

The problems with the distorted shape of the site is obviously exacerbated by the proposal to keep a hanger on the site, which effectively sterilises a large area of the school site.

The scheme design boundary shown on **design update May 2020 REVA** doesn't match the boundary within the application

These constraints, alongside the restricted building area, have the potential to hamstring the school's initial layout and give no potential to flex and meet future requirements.



Given the above the following would need to be agreed with English Heritage and the District

- a) English Heritage/District to accept the realignment of the boundary to ensure a playing field could be provided

- **Site boundary location**

The documents state that the change in school site boundary follows detailed discussions with the County Education Authority. OCC have not been party to the latest iteration. As with previous iterations the boundary location result from the developer's response to English Heritage. The current boundary was also requested by English Heritage asking for the boundary to follow the line of the hangers that are situated outside of the proposed school site area. There appears to be a further contortion being made along the Eastern boundary, rather than having a straight line.

The location of the boundary to run from one hanger to another gives a clear risk, on safeguarding grounds, for the perimeter of the school to be compromised. Comfort has not been provided to ensure that a fence can be created to abut these builds that would not be scalable and would not create additional cost for the school to maintain in the long term.

NB the existing and proposed fencing plan (Fig 4.5a) does not marry with the school site boundary

Given the above the following would need to be agreed with English Heritage and the District

- a) English Heritage/District to accept a detailed design and construction to be proposed by the developer and agreed by the OCC

- **English Heritage and CDC –further issues to be resolved (along with all these noted above and below) as previously identified**

The following have not been resolved.

- 1) CDC and HE objection to the removal of the hardstanding; the use of a concrete area is not an appropriate surface for a school that needs to create a porous macadam multi-use games area to meet their hard outdoor PE area requirements inline with BB103. The problem with the potentially uneven surfaces and levels remains.
- 2) CDC and HE objection regarding the lack of justification for harm to heritage assets;
- 3) The CDC/HE requirement to run the fencing around the facades of the other hangers would give potential for climbing, which is difficult to protect against when fences come into contact with buildings. If this is to be part of the design to satisfy heritage concerns, evidence that this would not be a security/safeguarding risk is required based on a detailed design.
- 4) Based on limited Topographical information provided adequate boundary treatment needs to be demonstrated to remove proposed rat run / garbage trap that the proposed levels inside and outside the site will not undermine site usage
- 5) There is no contamination.
- 6) Along with confirmation that HE would not object, Developer to provide information on proposed work to hanger including demonstrating that it can be made safe for children playing around it and that the lower 2.4m cladding can be raised

- **Contamination**

Confirmation is required that there is no contamination and that all services, buildings, hardstanding, trees and shrubs will be removed.

- **Noise**

The requirement for school sites is that the highest noise level on the school boundary shall not exceed 50dB LAeq,30min. Confirmation is required that the use of adjacent land will not allow this level to be exceeded.

- **Ecology**

Confirmation is required that there are no badge sets located on the proposed school site

Confirmation is required that the school site will be free from any other ecological constraint.

- **Trees**

The tree survey plan appears to show root protection areas that effectively remove any possibility of building on the small areas that has been identified as building area. Confirmation that all trees will be removed is required.

Schools also require shade to outdoor spaces along with habitat areas and landscaping. The exact extent of the restrictions needs to be fully understood and agreed to, if possible, before objection can be removed.

- **Stormwater**

Given the extent of the current restrictions to the site any attenuation required needs to be agreed. No over ground attenuation is accepted on school sites and the cost for schools of maintaining underground attenuation is prohibitive. The location of attenuation for the school, maintained by the Developer's management company is to be identified.

Officer's Name: Jane Farrow

Officer's Title: Corporate Landlord Officer

Date: 29/06/2020
