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| **Title:**  | **Planning Application: 18/01333/F: Launton – Bicester Heritage, Buckingham Road, Bicester** |
| **Request Date:**  | 3 September 2018 |
| **Due:**  | 24 September 2018 |
| **Issued:**  | 14 September 2018 |
| **Name of Cherwell Employee Requesting:** | Jenny Barkerjenny.barker@cherwellandsouthnorthants.gov.uk 01295 221828   |
| **Details of Request:**  | Assessment for compliance with ESD policies |
| **Actions:**  | See comments below  |

**Planning application:**

This application is for an extension to the existing Technical Site at the former Bicester RAF base, to provide new employment units comprising:

* flexible B1(c) light industrial, B2 (general industrial), B8 (storage or distribution) uses
* ancillary offices
* storage
* display and sales
* associated access and parking
* landscaping

The total GIA is 6530m2 and there are 125 car spaces, 14 bicycle sheds, and 15 cycle spaces proposed.

**Assessment:**

The planning application documents were reviewed and considered against Cherwell’s Local Plan and in particular the ESD policies 1-5. Compliance with policy requirements was considered and findings are set out below.

The documents reviewed included:

* Planning Statement
* Heritage Impact Assessment
* Flood Risk Assessment (this covered the hotel application on this site only)
* Design and Access Statement

**Table 1**: Sustainability and energy requirements and applicant’s response

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| **Item** | **Requirement**  | **Response**  |
| Policy ESD 1: Mitigating and Adapting to Climate Change  | Measures will be taken to mitigate the impact of development within the District on climate change. At a strategic level, this will include:* Designing developments to reduce carbon emissions and use resources more efficiently, including water (see Policy ESD 3 Sustainable Construction)
* Promoting the use of decentralised and renewable or low carbon energy where appropriate (see Policies ESD 4 Decentralised Energy Systems and ESD 5 Renewable Energy).
 | **No information is provided to cover this. This is not compliant with policy and further detail is required.**  |
| Policy ESD 2: Energy Hierarchy and Allowable Solutions  | In seeking to achieve carbon emissions reductions, we will promote an ‘energy hierarchy’ as follows:* Reducing energy use, in particular by the use of sustainable design and construction measures
* Supplying energy efficiently and giving priority to decentralised energy supply
* Making use of renewable energy
* Making use of allowable solutions.
 | **From the Design & Access Statement**Sustainable design and construction and renewable solutions will be implemented for the proposals wherever possible. **This is not compliant and further detail is required.**  |
| Policy ESD 3: Sustainable Construction  | All new non-residential development will be expected to meet at least BREEAM ‘Very Good’ with immediate effect, subject to review over the plan period to ensure the target remains relevant. The demonstration of the achievement of this standard should be set out in the Energy Statement.All development proposals will be encouraged to reflect high quality design and high environmental standards, demonstrating sustainable construction methods including but not limited to:* Minimising both energy demands and energy loss
* Maximising passive solar lighting and natural ventilation
* Maximising resource efficiency
* Incorporating the use of recycled and energy efficient materials
* Incorporating the use of locally sourced building materials
* Reducing the impact on the external environment and maximising opportunities for cooling and shading (by the provision of open space and water, planting, and green roofs, for example); and
* Making use of the embodied energy within buildings wherever possible and re-using materials where proposals involve demolition or redevelopment.
 | **From the Design & Access Statement**Sustainable design and construction and renewable solutions will be implemented for the proposals wherever possible.Section 5.5 discusses materials in a heritage context but also notes that the siting of the buildings is such that they take advantage of maximum natural daylight and control of solar gain. It also notes that internal spaces have been designed to consider their requirements for design efficiency, practicality and user comfort/well-being. **However, no evidence is provided to support this.** **Sustainability section within the DAS:** Sustainability measures that are integrated in the building design from the outset, will provide significant energy and carbon savings over the life of the building.A holistic approach will be taken as sustainability encompasses more than just energy reduction; the proposed approach will be to consider means of meeting the internal conditions whilst providing sustainable design associated with the buildings’ energy use, carbon dioxide emissions, material selections and methods of construction respectively. The following list is provided to demonstrate compliance with ESD 1, 3, and 5 including BREEAM “Very Good” as a minimum:* Natural ventilation, daylighting occupant controls, air quality
* Process heat recovery where possible
* Investigate solar thermal hot water generation and other renewable solutions wherever possible
* High efficiency plant
* Water efficient sanitary fittings
* Enhancing ecological value of external areas by increasing biodiversity
* Using native and adaptive species
* Use of locally sourced and/or recyclable materials wherever possible
* Pre-fabrication of materials to reduce on-site waste wherever possible

**This is not compliant with policy as it does not demonstrate how these requirements will actually be achieved. Further detail is required.**  |
| Policy ESD 4: Decentralised Energy Systems  | The use of decentralised energy systems, providing either heating (District Heating (DH)) or heating and power (Combined Heat and Power (CHP)) will be encouraged in all new developments.A feasibility assessment for DH/CHP, including consideration of biomass fuelled CHP, will be required for all applications for non-domestic developments above 1000m2 floorspace.Where feasibility assessments demonstrate that decentralised energy systems are deliverable and viable, such systems will be required as part of the development unless an alternative solution would deliver the same or increased benefit. | **From the Design & Access Statement**Sustainable design and construction and renewable solutions will be implemented for the proposals wherever possible.**This is not compliant with policy as it does not demonstrate how these requirements will be achieved. Further detail is required.** |
| Policy ESD 5: Renewable Energy  | A feasibility assessment of the potential for significant on site renewable energy provision (above any provision required to meet national building standards) will be required for all applications for non-domestic developments above 1000m2 floorspace.Where feasibility assessments demonstrate that on site renewable energy provision is deliverable and viable, this will be required as part of the development unless an alternative solution would deliver the same or increased benefit. | **From the Design & Access Statement**Sustainable design and construction and renewable solutions will be implemented for the proposals wherever possible.**This is not compliant with policy as it does not demonstrate how these requirements will actually be achieved. Further detail is required.** |
| Policy ESD 15: The Character of the Built and Historic Environment | Consider sustainable design and layout at the masterplanning stage of design, where building orientation and the impact of microclimate can be considered within the layout.Incorporate energy efficient design and sustainable constructiontechniques, whilst ensuring that the aesthetic implications of green technology are appropriate to the context (also see Policies ESD 1 - 5 on climate change and renewable energy).Use locally sourced sustainable materials where possible. | **From the Planning Statement** Paragraph 7.33 states that in accordance with ESD15 the proposed development will deliver a high-quality design in the vicinity of heritage assets and will be sensitively sited and integrated in accordance with national planning policy and guidance.Paragraph 7.36 states that in accordance with Policy ESD15 the siting of the new buildings respects the traditional pattern of routes, spaces, blocks and plots. Central to the layout of the site is the reinstatement of the historic alignment of Skimmingdish Lane that will be a key internal access route and will create a central vista. **This is not compliant with policy as it does not demonstrate how these requirements will actually be achieved. Further detail is required.****From the Design & Access Statement** The design will be of high quality, with massing, building forms and materials that respect their context. The proposals will enhance this area of the Bicester Heritage site by taking this degraded edge and tying it back with the existing Technical Site.**This is not compliant with policy as it does not demonstrate how these requirements will actually be achieved. Further detail is required.** |
| Strategic Development: Bicester 8 – Former RAF Bicester | The whole of the site is a conservation area, which was reviewed and extended in 2008, and most of the buildings and structures are protected by listing and scheduling.Policy Bicester 8 seeks to secure appropriate uses for a long-lasting 'conservation-led' approach to the technical site and flying field. It aims to establish uses that will be complementary to, and help enhance, the character and appearance of the conservation area and the nationally important heritage value of the site. It seeks to encourage a mix of uses that will best preserve the sensitive historic fabric and layout of the buildings and the openness of the grass airfield. However, the need to allow some flexibility in the interests of securing an economically viable future for the site is recognised.The Council will encourage conservation-led proposals to secure a long-lasting, economically viable future for the Former RAF Bicester technical site and flying field. It will support heritage tourism uses, leisure, recreation, employment and community uses. The development of hotel and conference facilities will also be supported as part of a wider package of employment uses.They must maintain and enhance the character and appearance of the conservation area, protect listed, scheduled and other important buildings, their setting, and protect the sensitive historic fabric of the buildings and preserve the openness of the airfield. Opportunities for improving access to the countryside will be encouraged. Proposals should be considered against Policy ESD 15. | **From the Planning Statement:** It is stated that design has been addressed through pre-application discussions and there are summarised at various sections within the document; it is also stated that the proposals are now in accordance with ESD 15. **This is not compliant with policy as it does not demonstrate how the requirements around energy efficiency, renewable energy, and sustainable construction under ESD 15 will actually be achieved. Further detail is required.** |

**Assessment**

This is a full planning application which includes a number of statements regarding sustainability, energy efficiency, and renewable energy options. However, it does not provide sufficient detail to assist in determining how the ESD policy requirements will be met and what considerations have been made before determining the final shape of the proposals.

No evidence is submitted in response to the requirements set out policies ESD 1 and ESD 2. **The application is therefore not compliant and further detail is required. This could take the form of an Energy Strategy and/or Sustainability Assessment.**

Reference is made to complying with ESD 3 requirements for sustainable construction, however, no details are provided to demonstrate how this will be achieved. **While the commitment to consider these is a positive step, it falls short of demonstrating compliance. We would like to see detailed measures that will demonstrate how zero carbon or carbon neutrality will be achieved. These should include a mix of measures including, but not limited to: orientation, building fabric, construction materials, and passive and active measures that will reduce energy demand. As it stands, the application does not comply with policy requirements.**

Reference is made to achieving BREEAM ‘Very Good’ within the Design and Access Statement, however, no evidence is submitted to demonstrate how the necessary credits will be achieved. **This does not comply with the requirements of policy ESD 3. We would like to see further detail of how this will be achieved in the form of a detailed Sustainability Strategy.**

The sustainability statement section (8.1) within the Design & Access Statement lists a number of principles and commitments that the applicant will implement (see table above). However, there is no analysis submitted to demonstrate that these measures can and will meet ESD policy requirements. **While these commitments are positive, there is little evidence to demonstrate compliance with ESD 3 and ESD 15. We would like to see a more detailed, quantifiable assessment in the form of an Energy Strategy and Sustainability Statement. As it stands, the application does not comply with policy requirements.**

The application documents make reference to renewable solutions being considered, however, there is no commitment made at this point to forms of renewable energy that were either considered (and perhaps rejected), or which are to be implemented. The same applies to the consideration of decentralised energy. **The application therefore does not comply with policy requirements ESD 4 and ESD 5. Further detail is necessary to demonstrate how decentralised and renewable energy will be incorporated into the proposals.**

The focus of the Planning Statement in relation to policy ESD 15 is around the heritage elements – i.e. character and massing in relation to the existing buildings. However, there is no reference to how the proposals will comply with the requirements for orientation in relation to microclimate or energy efficiency and sustainable construction methods. No reference is made to using locally sourced building materials. While there is much discussion throughout the application documents around compliance with ESD 15 regarding form and character, it is also recognised that this is constraints-led rather than with a view to sustainability and energy efficiency. This is due to the heritage and conservation importance of the site. The feedback during pre-application discussions encouraged a conservation-led approach to design and this is what has been followed and presented. When it comes to scale, form, and massing, the proposals follow the Heritage Partnership Agreement with regard to materials to be used. This includes red brickwork, corrugated panels, and glass for windows, openings and skylights. Orientation is considered in line with the existing grain of the site and retention of its conservation character. **While these commitments are very positive, there is little evidence to demonstrate compliance with ESD 15. We would like to see a more detailed, quantifiable assessment in the form of an Energy Strategy and Sustainability Statement.**

**Conclusion**

Although reference is made in a number of places within the application documents to complying with energy and sustainability requirements, there is little evidence to support those statements. A qualitative sustainability statement is included within the Design and Access Statement, but carries little detail. An Energy Strategy has not be submitted as part of the application suite of documents. **This application is therefore not compliant with the policy requirements set out in Strategic Development: Bicester 8: Former RAF Bicester, or the Local Plan policies ESD 1-5 and ESD 15.**