

TO: planning@cherwell-dc.gov.uk

25th July 2019

RESPONSE TO PLANNING APPLICATION 19/01177/F
Erection of ten residential dwellings off South Side, Steeple Aston

Thank you for consulting Mid-Cherwell Neighbourhood Plan Forum (MCNPF) on this application.

MCNPF wishes to make a number of comments, identifying several of our policies that we consider apply to the proposals. The summary of our comments is that: **While MCNP Forum is supportive in principle of the development of this site for housing, there are a number of important elements of the scheme as submitted that do not comply with MCNP policies. We therefore request that CDC advise the applicants to resubmit the scheme once suitable modifications have been made.**

Our comments, together with the policies to which they refer, are as follows:

1. POLICY PD1: DEVELOPMENT AT CATEGORY A VILLAGES

Residential development proposals at Fritwell, Kirtlington and Steeple Aston in the form of infilling, conversions and minor development will be supported in principle within the settlement areas established and defined in Policy Map Figs. 9, 10 and 11 respectively.

Any residential development proposal which is outside the settlement areas of these three villages must have particular regard to all the following criteria:

- a) The site should be immediately adjacent to the settlement area*
- b) The site should not be the best and most versatile agricultural land and the use of previously developed land is particularly likely to be acceptable.*
- c) The development should conserve and, where possible, enhance the landscape.*
- d) The development should conserve and, where possible, enhance the special interest, character and appearance of the conservation areas and the significance of other heritage assets (see Appendix K: Heritage and Character Assessment).*
- e) The development should not give rise to coalescence with any other nearby settlement. This particularly applies to Steeple Aston and Middle Aston.*

The total indicative number of additional dwellings permitted during the Plan period either within the settlement areas of these villages, or adjacent to them, shall be approximately 25 for Fritwell, 17 for Kirtlington, and 20 for Steeple Aston (as detailed on p.29).

Comments:

The application site is outside the settlement area for Steeple Aston. However, it does meet criteria a), b) and e) of policy PD1. We also consider that the proposals appear to minimise loss of existing landscape features (hedges and trees) and that c) could therefore be satisfied (however – see also comments in relation to policy PD5 below). We note that there are trees with TPOs on the site.

Of more concern is whether criterion d) is satisfied by the proposals. The Steeple Aston Conservation Area includes the road and its verges for the entire length of the application site, and the site is also within sight

of a listed building (Red Lion Corner House). The proposed development, if approved, will become the first housing to be encountered on entering the village and its conservation area, and therefore the design of the scheme and its impact on the appearance of the conservation area is of importance. This “gateway” site could, with careful design, be an addition to the village that might (as required by the policy) “enhance the character and appearance of the conservation area”. As currently designed, however, MCNP Forum is of the view that the scheme design contains elements that are inappropriate for the village. Design issues are dealt with in more detail below under policy PD5: Site and Building Design.

Therefore, as regards policy PD1, we consider that the scheme could be considered acceptable in principle, being within the total indicative number of dwellings for Steeple Aston, subject to also meeting other MCNP and CDC policies. **However, it does not currently meet the requirements of criterion d), and should be modified as recommended under policy PD5 comments below.**

2. POLICY PD4: PROTECTION OF IMPORTANT VIEWS AND VISTAS.

The first two paragraphs of this policy are considered not to apply to this site. The third paragraph reads:

Applicants for development in or adjacent to a Conservation Area must demonstrate in a Heritage Impact Assessment that they have taken account of the appropriate Conservation Area Appraisal, and of the Heritage and Character Assessment at Appendix K, and demonstrated that the proposal causes as little harm to an identified view as possible and that any harm is outweighed by the benefits of the proposal. The development should not harm the Conservation Area and its setting, other heritage assets, or historic street and village views and longer distance vistas.

Comment: the applicants have not supplied a Heritage Impact Assessment as required, and should be asked to do so in order to comply with this policy, and to demonstrate that the benefits of the scheme outweigh any harm to the Conservation Area. In particular, it is noted that the street scene drawing P224.SS.01E fails to show the existing buildings immediately adjacent to the proposed development at each end of the site; it is therefore difficult to assess the impact of the scheme in its proper context. A revised drawing should be requested.

MCNP Forum is also concerned that the applicant makes no reference to the appearance and impact of the proposed development as seen from the public footpath across the fields to Hopcrofts Holt, or whether it will be seen from the A4260, especially in winter. The impact on these views could have a harmful effect on the setting of the Conservation Area. Visibility of the new houses from the A4260 could be harmful to the rural character of the village, which is currently not visible from that road.

It is MCNP Forum’s view that the application does not at present satisfy policy PD4.

3. POLICY PD5: SITE AND BUILDING DESIGN

New development should be designed to a high standard which responds to the distinctive character of the settlement and reflects the guidelines and principles set out within the Heritage and Character Assessment (see Appendix K). Development proposals should have full regard to the following criteria:

a) Proposals should wherever possible include appropriate landscape mitigation measures to reduce the impact of the built form, to ensure that development is in keeping with the existing rural character of the village, and to provide a net gain in biodiversity.

b) Development affecting existing traditional stone walls should identify them on proposals drawings, and wherever possible retain and/or repair them using traditional forms and materials.

c) Proposals for minor development schemes (excluding infill and conversions) of new housing will be required to provide new or improve existing footpaths and cycle ways to ensure that new residents of all ages and mobility have safe access to village amenities such as the school, bus stops, shop and green spaces. Where new routes are proposed to meet this requirement, the development proposals shall contain full details of all associated materials and infrastructure.

d) The section on Managing Change on p.76 -77 of the Heritage and Character Assessment (see Appendix K), which sets out general principles and specific recommendations for villages highlighted in the document.

Comments:

With regard to criterion d), the applicants claim in their Design and Access Statement that “The scheme has been designed with careful reference and respect for the existing village context, but with a clear appreciation and knowledge of contemporary requirements” and that “the design responds sensitively and appropriately to the immediate and wider contexts through a thoughtful and considered architectural proposal”.

Under our comments on Policy PD1 (d) above, we have already expressed concern that “*the development should conserve and, where possible, enhance the special interest, character and appearance of the conservation areas and the significance of other heritage assets.*” Policy PD5 confirms that development should respond “*to the distinctive character of the settlement and reflects the guidelines and principles set out within the Heritage and Character Assessment (see Appendix K).*”

Appendix K has a section on Steeple Aston which warns, under “sensitivity to change”, of the danger of unsympathetic infill developments and urban extensions.

We strongly consider that as currently designed this application does not achieve the objectives set out in PD1 and PD5 for the following reasons:

- the separation of the semi-detached pair of 2-bedroom dwellings (in an earlier scheme) into two dwellings attached by their garages has resulted in elevations of unacceptable proportions, a form alien to the village, and usually only found in some modern housing estates where design quality is largely absent (see images below). This error, which applies also to the adjacent 3-bed house, does not support the applicants’ view that the scheme is “of the highest architectural quality”, nor does it meet the similar requirements of policy PD5.
- there appear to be three different colours of roofing materials proposed. Red tiles are not characteristic of the village. Grey slate is almost universal.
- limestone external walls appear to be limited to the front elevations. The view of the development from the public footpath to the rear of the site will be of brick facades, which may be considered to be inappropriate on the edge of the Conservation Area.
- the design uses a number of building forms that are not represented in the village. For example, the use of hipped roofs on the garages (see image below).
- the deliberate use of several different building forms within this relatively small scheme, and the proposed changes of roof colour, are familiar devices deployed by many developers to provide variety across the scheme and to provide each house with its own individual character. While these may play a role in selling the houses, they are not consistent with the stated aim of “careful reference and respect for the existing village context.” The most frequently found building form in the village is that of the small villa, shown in the photo below. There are many examples of these, with some variations of detail, in the village. A more thoughtful approach would therefore, in MCNP

Forum’s opinion, be based on a more limited and consistent use of building form and materials, reducing the rather “forced variety” of the current proposal. A good example is the Shepherds Hill scheme on Fenway, built in 2000 (shown below).

- we consider that the application scheme might achieve the MCNP policy aim of enhancing the Conservation Area if it reflected the most characteristic materials and forms in the consistent manner we have discussed here.



The proposed streetscape – “forced variety”



Hipped garage roofs and red tiles - uncharacteristic



The superceded 2018 semi-detached pair



The current scheme – alien and unacceptable forms



A typical village villa: Brunstone on South Side



Shepherds Hill: consistent use of form and materials

Criterion a) of Policy PD5 covers landscape mitigation measures and a net gain in biodiversity. The applicants have proposed a “planted buffer strip” along two of the site boundaries. MCNP Forum suggests that in view of concerns already expressed regarding views of the site from the south and south-west, it would be beneficial in several respects if these “strips” were in fact to be deep multi-species hedges created along the entire length of the southern and eastern edges of the site, outside the boundaries of the residential gardens, and nurtured to ensure complete screening of the development within a few years.

Revised planning guidance from MHCLG (July 2019) on Natural Environment has just been issued. It states, inter alia, that: *“An applicant may also propose measures to achieve biodiversity net gain through a unilateral undertaking. The work involved may, for example, involve creating new habitats, enhancing existing habitats, providing green roofs, green walls, street trees or sustainable drainage systems. Relatively small features can often achieve important benefits for wildlife, such as incorporating ‘swift bricks’ and bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat.....Care needs to be taken to ensure that any benefits promised will lead to genuine and demonstrable gains for biodiversity. Discussions with local wildlife organisations can help to identify appropriate solutions.....”* (Paragraph: 023 Reference ID: 8-023-20190721). MCNP policy PD5 also promotes (in its rationale section 3.2.30): *“New buildings should wherever possible incorporate special bricks or boxes designed for swifts.....”*. **MCNP Forum would like Rectory Homes to consult with Wild Oxfordshire or other local wildlife bodies and to see the resulting proposals for responding to the MHCLG guidance.**

Criterion b) covers the retention of traditional stone walls. There are two sections of wall separating the site from the road, and it is understood that these are to be repaired and retained. In doing so, it is important that their traditional character is maintained.

Criterion c) covers the need for a footpath and cycleway link to the village. MCNP Forum is satisfied that, in contrast to the earlier application, the proposed footpath link meets the requirements of this policy, on the basis that OCC Highways consider the scheme to be acceptable and safe.

Overall, however, MCNP Forum considers that the requirements of Policy PD5 have not been met by the current design of the scheme. The applicants should be required to modify and if necessary re-submit the scheme, taking full account of all the comments made above.

4. POLICY PH1: OPEN MARKET HOUSING SCHEMES:

Where other policies permit such development, any new market housing should favour homes with a smaller number of bedrooms. The mix of housing will be determined having regard to the evidence of housing need in the Oxfordshire Strategic Housing Market Assessment, or more up to date published evidence, and the characteristics of the location and site. On the basis of the 2014 SHMA, in developments of 10 dwellings or more the indicative mix should be: 30% 1 or two bedrooms, 46% 3 bedrooms and no more than 24% with 4 bedrooms or more. Smaller schemes should aim for a similar mix where possible.

Comments: The scheme has been altered since an earlier application (18/01482/F) to which we objected. The current application now proposes three 4-bedroom, five 3-bedroom, and two 2-bedroom dwellings. The proposed mix would offer more affordable homes to local people, which is a key objective of the neighbourhood plan.

We are slightly concerned to note that, by comparison with the other dwellings, the two 2-bedroom dwellings have very tightly planned internal layouts on a small footprint. There is very limited storage space and no utility room, for example. MCNP Forum considers that, being market housing, they would be more

successful if they had rather more generous space standards, which would appeal to local people downsizing, but who are used to rather more generous room sizes.

5. POLICY PH3: ADAPTABLE HOUSING

Housing development will be favoured that is designed with features that enable residents to live there throughout different phases of their lives, and be capable of internal and external adaptation to help achieve this aim. Such housing should be built amongst other homes to mitigate isolation and loneliness.

Support will be given to new houses being constructed to Building Regulations Part M (4) as amended). In addition, where possible, dwellings that are on one level should be included, to meet the need for such accommodation in particular for older people and those with disabilities.

Comments: The applicants make no mention in their Design and Access Statement of which standard in Part M(4) they intend to apply to this scheme. In MCNP Forum's view, in a development of 10 market homes, a number of them should be designed to the highest standards of accessibility - M4(3), while the remainder should be to M4(2). This is to reflect the likely demand for these new homes from an older generation of local people who are keen to downsize, but who in later life may have issues with mobility. **We would like CDC to apply a condition, relating to this MCNP policy, to any approval.**

ADDITIONAL POINTS

In addition, we would like to make the following observations, which are not supported by MCNP policies, but which we would like CDC to consider:

- the close proximity of the 3-bed dwelling on plot 1 to the industrial use adjacent, being a car maintenance workshop, with planning approval for a large extension.
- the absence of any communal green space or play area for small children on the site; the popular play and recreational facilities adjacent to the Village Hall in Fir Lane are a considerable distance from the application site, and probably too far for parents and young children to walk. CDC policy BSC11 requires that developments of 10 dwellings or more must provide a Local Area for Play to the defined standards.
- a modest contribution to climate change concerns would be the inclusion of electric car charging points, well-designed photovoltaic panels on the south-facing roof slopes of each dwelling (which should be largely unseen from the road), and low carbon heating systems. MCNP Forum would like to see Rectory Homes providing an exemplar scheme in this regard.

SUMMARY: While MCNP Forum is supportive in principle of the development of this site for housing, there are a number of important elements of the scheme as submitted that do not comply with MCNP policies. We therefore request that CDC advise the applicants to resubmit the scheme once suitable modifications have been made.

MCNP Forum would be happy to work with the applicants, who have been keen to involve us to date, in reaching appropriate solutions.

Mid-Cherwell Neighbourhood Plan Forum

July 2019