

**Planning Services**  
HEAD OF SERVICE: Adrian Duffield



Listening Learning Leading

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**Our Ref: P17/S01243/PEJ**

By email only

Dear Rebecca,

**Site: Land East of Park Road, Didcot**

### **Proposed residential development of up to 150 dwellings**

I write further to your submission of the above pre-application proposal received on 30 March 2017 and our meeting held on 27 April 2017. In your letter, you have requested advice on the principle of the development, the proposed scale and design of the development, likely planning obligations and the scope of documentation for a planning application.

#### **Principle of development**

Policy CSS1 provides the overall strategy for the district. In short summary, this directs new development to the growth town of Didcot, the market towns of Henley Thame and Wallingford and twelve larger villages in varying proportions. Policy CSDID3 allocates land to the North East of Didcot for 2,030 homes. In addition to this site allocation, the policy states that planning permission will be granted for housing on suitable infill or redevelopment sites.

The proposed development site would border houses to the north that form part of Didcot, but would not border housing on its other boundaries. As such, the proposal would not constitute infill development. The development proposal would therefore not accord with the development plan.

However, the council cannot currently demonstrate a five-year supply of deliverable housing sites. As specified in Paragraph 49 of the NPPF, our housing supply policies should therefore not be considered up to date. Paragraph 14 adds that where relevant policies are out of date, planning permission should be granted unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole;
- or specific policies in the Framework indicate development should be restricted.

From the information provided with the pre-application request, it is difficult to determine whether the proposal constitutes a sustainable form of development and whether the benefits of the proposal outweigh any harm. The proposal potentially raises issues on landscape, conservation and transport grounds as explained below.

### **Landscape and Visual Impact**

Policy C4 of the South Oxfordshire Local Plan (SOLP) states that development which would damage the attractive landscape setting of the settlements of the district will not be permitted. The effect of any proposal on important local landscape features which contribute to the visual and historic character and appearance of a settlement will be considered. Policy G2 of the SOLP states that the districts' countryside and settlements will be protected from adverse developments and Policy G4 highlights the need to protect the countryside for its own sake.

The proposed development site is locally prominent with views of it afforded from nearby footpaths and the national cycle route. The open separation between Didcot and nearby Coscote and West Hagbourne is very apparent and the site contributes to this. The site is within the setting of the AONB and distant views from the site are afforded towards the AONB. The development site would result in a significant incursion into the open countryside and the open character between Didcot and nearby Coscote and West Hagbourne would be eroded.

If the site area of the proposal were to extend further to the east and less to the south towards Coscote, this would help to reduce the level of incursion into the open countryside and the erosion of the open character. The extent of the harm to the open character separating Didcot from Coscote and West Hagbourne will need to be fully assessed as part of a Landscape and Visual Impact Appraisal.

### **Conservation impact**

The Council's Conservation Officer has advised that the application site has clear visible historic landscape features across its entirety and beyond. The distinctive ridge and furrow formations are indicative of medieval strip farming that was once commonplace across Oxfordshire and its survival is becoming increasingly rare. At this stage, the Conservation Officer considers that the ridge and furrow is a non-designated heritage asset as defined in the NPPF.

It is strongly advised that any application provides a detailed Heritage Significance and Impact Assessment that should include designated heritage assets and this non-designated asset of the ridge and furrow. The contribution that this remaining historic

agricultural feature adds to the landscape character and value of the area should also be considered within the LVIA that should accompany a full application. This is the minimum required by paragraph 128 of the NPPF.

The Conservation Officer has advised that you should seek advice from the County Archaeologist and the Historic Areas Planning Team for Historic England as to the potential archaeological interest of the site in order to provide appropriate archaeological assessment with a full application.

### **Highways impact**

The trip generation and distribution data for vehicles associated with the proposed development site have not been provided. Therefore, it is not possible to provide commentary on the likely impact on Park Road and the local road network. I note that not all the site would be within 400m catchment of an hourly bus. This raises concerns at this stage in relation to the sustainability of the site. Oxfordshire County Council as the Local Highway Authority will comment further on this matter once a Transport Assessment is submitted. However, I would advise that this issue will need to be factored into the planning balance when assessing whether any harm created by the scheme would be outweighed by the benefits.

The Development Framework Plan submitted shows a proposed pedestrian/ cycle route linking Didcot and Coscote. This new link is shown outside of the red site boundary. For the link to be provided as part of the development proposal, it would need to be included within the red outline. I have consulted the County Council of the proposal, however at the time of writing I have not received a response. I will forward this onto you once I have received it.

### **Urban design**

The Council's Urban Design officer has been consulted on the proposal and has provided the following comments:

#### Responding to site and surrounding

- As part of the proposal, the applicant will need to demonstrate a clear link between their appraisal of the context, any applicable planning designations, the character of their site, physical constraints and opportunities and their development proposals (see Part 2 section 1 and 2 of the adopted SODC Design Guide 2016, in particular page 27). This link/ rationale will need to be identified as part of a Design and Access Statement (DAS). A character study will need to be carried out in order to identify the context within which the application site is set. A series of figure ground diagrams detailing how Didcot has grown over the years should be submitted as part of the DAS which will allow us to understand the settlement pattern of the town. Figure ground plans show how the settlement forms and helps define the feel and character of the

area. I am not entirely sure how the current proposal has taken any of this into account (criteria 1.7 page 27 SODC Design Guide).

- The DAS will need to explain the design rationale behind the scheme, detailing amongst others what design cues have been used from Didcot to inform the design and therefore reinforce its character. This will help to create a sense of place where people will want to live, work and play. The DAS will need to show how the proposal will respond positively to and respect the character of the site and its surroundings, enhancing local distinctiveness (see South Oxfordshire policy CSQ3). The DAS will also need to demonstrate that the development is of a scale, type and density, appropriate to the site and its setting.
- Make sure to develop a design concept/ rationale that follows the constraints and opportunities plan. As it stands there is no design rationale developed from the opportunities and constraints plan, the team has jumped ahead and there is one step missing (see section Part 2 section 1 of the design guide).
- There is an archaeological ridge and furrow going right through the field. This has been picked up in the topographical survey but not in the constraints and opportunities plan.

### Layout

- For a development of up to 150 units, two accesses should ideally be provided allowing more opportunities for stronger connections with existing built up area to the north of the site.
- LEAP location seems isolated, it should be better integrated to the development.
- There is an existing strong building line on Park Road. This pattern should be replicated so as to give a strong sense of arrival coming into Didcot from Park Road. A landscape buffer along Park Road should also remain.
- The development should be better integrated to the existing built form fabric as opposed to being a close cell development.
- Make sure to provide a street hierarchy which would make the development easy to understand and navigate through and give a different role to each street. This will also allow to experiment with different surface treatments depending on the role of the street (criteria 3.2 page 31 SODC Design Guide).
- It is positive to see that the development looks outwards onto the countryside. There is potential for enhancing further the proposed north/south green corridors to connect the development to the wider countryside.

- The use of perimeter blocks ensures a clear definition of fronts and backs as well as provides a strong building line to the street (criteria 4.1 SODC Design Guide). However, note that at present the development appears slightly isolated from the strong building line along Park Road due to the wide buffer corridors. Closing these gaps slightly would help better integrate the development with existing. Development should also back onto existing built form.
- Making sure to create a strong sense of enclosure would ensure that buildings rather than roads have priority. Enclosure may be building dominated or landscape dominated. It is determined by the height of a building frontage relative to the width of the street. Trees, hedges and walls can also contribute towards creating a sense of enclosure. Provide the minimum space required for the roadway and use the resulting space for hard or soft landscaping with parking as appropriate.
- Start thinking about the impact on parking, a balanced approach should be taken to achieve convenient parking in close proximity to households whilst also reducing the dominance of car parking on the street scene (see section 3.3 of the SODC Design Guide). Soft landscaping can help to soften the impact of parking on the street. Non-allocated, shared parking, is more efficient than designating parking to individual dwellings. This can be considered to reduce parking numbers within the development scheme. On-street parking can also be used as a traffic calming measure (for a 20mph residential street). Some parking on-street can help slow down speeds.
- In order to aid legibility and identity, focal points throughout the site should be provided, especially at corner plots. Focal points should be visually prominent and buildings should specifically be designed for these areas (i.e. slight increased in building height/ difference in materials palette, etc). Exposed, blank gable ends with no windows fronting the public realm should be avoided.
- Start thinking about the location of refuse and recycling storage and collection facilities/cycling. These should be designed to be convenient and easily accessible, integrated with the surrounding environment and be as unobtrusive as possible (5.37 of the new South Design Guide 2016). If sited at the front of the property, they should be screened visually from the public footway. If convenient external access to rear gardens is provided, bin storage can be accommodated to the rear of the property, however, note that in some instances if residents do not have convenient access to the back, bins end up being left at the front which becomes unsightly in the street scene.
- Make sure that back-to-back distances are 25 metres.
- Think about making a clear distinction between public and private space.

- Providing surface water features/ SuDS is a positive attribute of the scheme as it can make a significant contribution to the landscape character, biodiversity and sustainable performance of development. It seems, however, that there is an opportunity to better integrate the SuDS features to the overall development.

## Ecology

The Council's Countryside Officer has been consulted on the proposal and has provided the following comments.

A population of common lizard was identified on the adjacent development site to the west of Park Road. The population was found mainly in the habitats to the north of this site where it bordered the existing southern edge of Didcot. Part of that population was translocated to Mowbray Fields LNR to the east when this site was developed. It is therefore possible that the species would be found in the habitats alongside the northern edge of your site adjacent to the public footpath. It is therefore recommended that reptile survey is undertaken in support of an application.

Overall the development should comply with policy CSB1 of the Core Strategy and if possible include a net gain in biodiversity but as a minimum avoid a net loss. A Biodiversity Impact Calculator has been provided by the Council's Countryside Officer under a separate cover.

## CIL and planning obligations

The council has an adopted Community Infrastructure Levy (CIL) Charging Schedule. This means, your proposal for new build residential development would be subject to a CIL charge of £150 per square metre (plus indexation). The CIL Regulation 123 list distinguishes the infrastructure to be funded through CIL from that which is to be secured through s106 and other statutory provisions. Further details relating to the CIL is available on the council's website using the following link:  
[Community Infrastructure Levy Charging Schedule](#)

A scaled back S106 would still be required to secure affordable housing and contributions towards on-site infrastructure, including street naming and bin provision. Contributions towards site specific highways matters would also be secured under a legal agreement.

## Scope of documentation for a planning application

Should an application be forthcoming, the following documents and technical studies would be among the documents required:

- Design and Access Statement
- Design Brief
- Planning Statement

- Landscape and Visual Impact Assessment
- Transport Assessment and Travel Plan
- Flood Risk Assessment
- Noise Assessment
- Construction Traffic Management Plan
- Archaeological Evaluation
- Heritage Significance and Impact Assessment
- Affordable Housing Statement
- Tree Survey and Arboricultural Report including method statement and tree protection measures
- Drainage Strategy – foul and surface water
- Ecology and biodiversity study (including reptile study)
- Air quality report
- Contaminated land preliminary risk assessment
- Sustainability Statement
- Statement of Community Involvement

## Summary

In terms of principle, the proposed development is contrary to the Council's development plan. As the Council cannot currently demonstrate a five year supply of deliverable housing sites, the housing supply policies are to be considered out of date. On this basis, the proposal should be considered favourably unless any adverse impacts would significantly and demonstrably outweigh the benefits.

From the information provided, there is the potential for harm to be caused to the open character of the landscape that separates Didcot from Coscote and West Hagbourne. This issue will require assessment through a submitted LVIA. Harm may also be caused to a non-designated heritage asset consisting of the historic ridge and furrow landscape feature. This issue will require assessment through a detailed heritage significance and impact assessment and the LVIA. A Transport Assessment is also required to establish impact of the proposed development on the local road network and the sustainability of the site in terms of access to public transport. Potential layout issues also exist in terms of the level of integration of the site with the adjacent development to the north.

I would stress that the above represents my personal opinion and is not legally binding on the council in the subsequent determination of any formal planning application. I hope this is helpful.

Please note that requests for pre-application advice received from 3 January 2017 onwards and the council's response will be made public once a subsequent relevant planning application is made. We will be making the submitted documents, our response and any interim correspondence public. We will endeavour to ensure that all personal information such as telephone numbers and e-mail addresses are removed from the documentation.

Yours sincerely,

Phil Moule  
Senior Planning Officer (Major Applications)