

Appendix 2: Summary of Public Consultation

Littlemore Park (14/02940/OUT)

The following comments from Statutory Organisations and Third Parties in relation to the application are summarised below

Public Consultation

Statutory Consultees

Littlemore Parish Council: Objection

The proposed development encroaches on consecrated ground (burial ground 1) that has yet to be deconsecrated. The proposed gardens of dwellings bordering the railway encroach on the burial grounds. The path linking the development to St Georges also encroaches (burial ground 2), the ownership of the pathway is private and not public and has been built on the graves of patients resident in Littlemore hospital. The archaeological report identifies this area as an “area of concern, and should not be built on”.

The proposal identifies 270 dwellings with 445 associated parking spaces, equating to 1.6 cars per dwelling. This ratio provides no provision for visitor parking. Armstrong Road will become under additional parking pressure from the development as it will be the only access for some 700+ people.

No open community space is planned, where pockets of space cannot be developed the developer has designated them green space. This diminishes the overall concept in terms quality living space. No provision has been given to the social and community needs of one of Britain’s largest cul-de-sacs.

Due to local shops being some 15 minutes away by car, there will be additional demands upon home owners to own and drive cars to their destinations. There are no doctor’s surgeries, dentist in Littlemore. Local schools (Nursery and Primary) in a recent report to Parish council stated they were full, and potential parents were on a waiting list. Concerns therefore in the area of residents assessing educational needs are a concern.

The T2/T3 provides no service on Sunday’s and no service after 6:39 weekdays. This service remains under pressure. Stagecoach currently, operates the 12C to Blackbird Leys and serves the residents of Littlemore and Sandford. This service will cease on the 30th May 2015. Placing more pressure on meeting the needs of potential residents

The proposed site is in a flood plain. Securing a 5m margin from the Littlemore Brook which is historically prone to flooding will put residents at risk.

The developer has adopted a ridge height to match the ridge height of adjacent properties of St Georges, regardless of topography. This is a wrong approach and merely a means of increasing the number of floors to a given building. If this rule is applied then it stands to reason that Littlemore hospital is the parent building,

therefore additional buildings should be subservient. The five floor flats would be detrimental to the skyline from the Sandford and Littlemore views, in what is a historical conservation area. The ridge heights should be no more than 3 floors to reflect the scale and visual amenity of other buildings in the area, and follow the topography and not challenge it.

Oxford Civic Society

The development of this site for housing is acceptable in principle, subject to the provision of a comparable accommodation for employment at the Churchill Hospital site. However many issues need to be resolved, including the following:

- Consideration of pedestrian access to the proposed new station at Oxford Science Park on the Cowley Branch railway line
- Routeing of bus services and location of stops
- Pedestrian and cycle routes on and off-site, including on private land through the grounds of the former Littlemore Hospital
- Parking provision for cycles and cars
- Detailed design of buildings, and their disposition, with consideration of effects on views, overlooking and shading.
- The Society concur with the views expressed by Mr Roe of 32 St George's Manor

Environment Agency Thames Region

The Environment Agency have withdrawn their objection to the application following the submission of the addendum to the Flood Risk Assessment and subject to the following conditions, detailed under the headings below, to any subsequent planning permission granted.

- The development is carried out in accordance with the approved Flood Risk Assessment Addendum produced by JBA Consulting (dated, 11 February 2015) and the following mitigation measures detailed within:
- There will be no residential development in Flood Zone 3
- There will be no basements or below ground parking in Flood Zone 2 or 3
- Finished Floor Levels will be set no lower than 300mm above the climate change flood level.
- No development including SuDS features will be within the 8m buffer zone of the Littlemore Brook.
- All above ground SuDS storage features will be sited outside the 1 in 100 year plus climate change outline.
- A Surface Water Drainage scheme is submitted
- A phased contaminated land risk assessment
- A verification report for any remediation works
- A watching brief for future contamination
- A restriction on foundation design

Berkshire Buckinghamshire Oxfordshire Wildlife Trust [BBOWT]

The Trust object for the following reasons:

Protected species

The application includes a Preliminary Ecological Appraisal (January 2014) which incorporates the results of a Phase 1 Ecological Survey. These surveys identify a

number of legally protected species as either being present on or adjacent to the site or there being a high likelihood of them being present. It also makes recommendations for additional surveys with respect to several of these species. There is no evidence of these additional surveys having been carried out. Without these additional surveys any necessary mitigation proposals for these species cannot be drawn up for assessment as a material consideration in the planning process. In the absence of these surveys and mitigation plans the application should not be approved.

The Preliminary Ecological Appraisal has recognised a reasonable likelihood of a number of protected species being present and affected by the development. Therefore surveys and mitigation statements should be provided prior to assessing the application for determination and approval. The fact that this is an Outline application makes no difference to the fact that surveys and mitigation details are needed prior to planning decision. This application is establishing whether or not it is appropriate for the site to be developed and as such this is the stage at which the detailed ecological assessment is required.

Species identified as being on site, or likely to be on site, include species protected under the Wildlife and Countryside Act 1981. They also include species protected under the EC Habitats Directive and The Conservation of Habitats and Species Regulations 2010 and as such, are European Protected Species. Offences under this legislation include any activities that may kill, injure or disturb an individual or damages or destroys a breeding site or resting place of that individual. The current development proposals do not provide adequate assurance that the populations of legally protected species identified on the development site will not be adversely affected by the proposals submitted. Without appropriate survey information on European Protected Species then it is not possible to assess whether a licence would be obtained.

Protected species

Bats: BBOWT accepts the reassurances provided by the City Council ecologist regarding bats subject to all the relevant requests for Conditions in their letter being put in place.

Otters and Water Voles: BBOWT accepts to some extent the reassurances by the City Council ecologist with respect to otter and water vole (subject to all the relevant requests for conditions in their letter being put in place), but with the significant proviso that in the absence of any survey and mitigation plans, and with the likely presence of both species, then the proposed SLINC/watercourse buffer and measures to protect it and ensure it remains unlit and with minimal disturbance, becomes the mitigation.

Reptiles: BBOWT remain concerned with the approach being taken with respect to reptiles. As the site contains a significant amount of suitable habitat, we consider it possible that in the worst case scenario the site could support very significant reptile populations which would be severely impacted by the development. We do not consider it appropriate to determine the application without knowing the size of the

populations of any reptiles present, and without having fully identified the viability of any necessary receptor sites.

Breeding Birds: We maintain our previous position with respect to breeding birds. Whilst we appreciate the City Council ecologist's response on this matter, the habitats on site provide both significant nesting opportunities and food resources, the loss of which to land take would need to be compensated rather than mitigated.

Retention of on-site habitats

The far western part of the site includes a number of large mature trees within a woodland habitat. Several of these large mature trees have High Retention Value. The application has rightly recognised the value of these and other trees, and the habitat they are within by maintaining this area free of development. It is important that the area of habitat at the western end is retained as natural habitat in its current form, and that it does not become a "mown grass open space" below the mature trees, as the combined habitats of bramble/scrub, younger trees and mature trees have significant biodiversity value. In the event of a path being routed through this area then it is important that this is routed so as to be well away from the most significant mature trees so as to avoid any potential compression damage to their root systems. This area should also remain unlit to avoid adverse impact on wildlife, especially bats.

Waste water infrastructure

We have noted the response from Thames Water which draws attention to the possibility of adverse ecological impacts on surface water courses within, or in the locality of, the application site. The matters raised in the Thames Water response are a concern in relation to two matters:

1. Littlemore Brook is adjacent to the development and is therefore vulnerable to the input of sewage and other forms of water pollution which could have a significant adverse impact on the ecology of the watercourse;
2. as our main premises are on Armstrong Road, adjacent to the development, we are naturally concerned in relation to the possibility of sewer flooding;

Off-site compensation and net gain in biodiversity:

We welcome the reassurances provided by the ecologist response with respect to the proposed site for off-site compensation. We re-iterate that we welcome the approach taken by the developers by using an accepted metric for Biodiversity Impact Assessment. However we maintain our position that for a development of this size on a site of this nature, it is not acceptable that the only habitat surveys carried out by the developers took place in December, one of the least suitable months of the year for such assessments. The developers accepted this by stating, in the Preliminary Ecological Appraisal in section 4.1: *"The timing of the phase 1 survey (10th December 2013) resulted in a survey constraint. The botanical survey season runs from April to October according to the Handbook for phase 1 habitat survey (JNCC, 2010). As the survey was undertaken outside the optimum season for botanical assessment, a full evaluation of the site was not possible."* With respect to the survey and habitat assessment for the development site we maintain our previous objection.

More work is needed to show the existing ecological value of the existing site, before a net gain in biodiversity can be demonstrated. This should be completed prior to

determination of the planning application. The principle of the mitigation hierarchy is that off-site compensation is only considered as a last resort. By scaling back the number of units on the site there would be room to provide on-site habitat restoration that could provide for a net gain in biodiversity without the need for off-site compensation.

Buffering of Littlemore Brook SLINC

We welcome the proposed buffering of Littlemore Brook SLINC but the width falls well short of what is needed. The SLINC and the wildlife it supports are highly vulnerable to the impacts of development and it is important to provide significant buffers in order to avoid the “significant adverse impact”. Even if it was not designated it would be important to provide a significant buffer to the watercourse. However, in places the proposed buffer to the water course is less than 10m (and therefore even less to the SLINC – see below), whereas developments nowadays are typically providing much more, even for watercourses without any specific designation. A wider buffer is needed to protect the watercourse and provide an ecological corridor alongside the watercourse. The buffer for Boundary Brook for example should be more in the order of 15m either side. Section 8.1 of the Preliminary Ecological Appraisal offers a buffer of 7m between the SLINC and any development, which is not sufficient. The SLINC itself is about 14m wide some of which is made up of buffer either side so as an estimate the currently offered 7m SLINC buffer plus about 4m buffer within the SLINC means that even under the current proposal of 7m SLINC buffer there should be a minimum of 11m between all development and the Brook which, according to the Illustrative Masterplan is not being achieved. The development should be reduced in scale in terms of number of units to increase the buffer alongside Littlemore Brook SLINC to a minimum of 25m, which will typically provide a 30m buffer away from the actual Brook. This buffer should be managed as wildlife habitat and not as regularly mown amenity grassland. It should also be unlit so as to provide a dark corridor for commuting nocturnal protected species such as bats and otters. Such a buffer would also serve to take most / all of the development outside of the Flood Zone as indicated in 2.10 of the Design and Access Statement.

Parking / Traffic

BBOWT’s main offices are located at the western end of Armstrong Road. Armstrong Road currently serves part of the St George’s Manor residential area, and several businesses along Armstrong Road. Some of these businesses, including ourselves, rely on the unrestricted parking available on Armstrong Road to enable staff, volunteers and visitors to access our offices. We are extremely concerned about the implications for the functioning of our operations if this development goes ahead in its current form.

We have read the objection from the Local Highways Authority. We fully support the case that the Trip Generation figures are significant underestimates. In particular we stress the following issues from the County Council transport response:

- “1. The site is not included as a residential site in the Oxford City Council Sites and Housing Plan 2011 – 2026 (Policy SP30).*
- 2. The site has limited access and permeability to the wider area, by sustainable modes (Contrary to Policy SP30, *ibid.*).*

3. The site is very much on the fringes of the Oxford City area and has accessibility characteristics more similar to that context than within the city. For example, the furthest part of site (the north-eastern corner) is very remote (up to 700 metres) from bus stops on the Sandford Road and the junction of Sandford Road and Armstrong Road is the only access to the site.

4. The predicted residential trip rates are considered to be low for a site in this location. As a consequence, it is considered that the proposals would be an over-development of the site for residential purposes”

With respect to Parking, there are likely to be greater levels of car ownership + visiting cars than the current provision of 445 spaces, leading potentially to overflow parking on Armstrong Road, with implications for our operations. This is also likely to displace current business parking further into other residential areas of Littlemore, affecting the wider community. If the low levels of car ownership per dwelling that the developers are aspiring to are to be realised then at the very least there will be need for a greatly enhanced provision of public transport from the adjacent bus stop on Sandford Road, and improved provision for cycling.

Lack of open space within the development

The Oxford Green Space Study 2012 suggests that Littlemore is already under-resourced with respect to high quality open access green space. This development should be making significant provision of open access green space of a variety of types. The plans at present do not provide sufficient green space and we do not consider them in keeping with the Oxford Green Spaces Strategy 2013 – 2027. This is likely to result in significant recreational pressure on areas that should be a priority for biodiversity including the buffer alongside Littlemore Brook SLINC and the woodland copse at the western end.

The development proposals should be scaled back in terms of the number of units, with significantly increased provision for public access open space in addition to increased provision of open space prioritised for biodiversity conservation.

Oxfordshire County Council

Highways Authority: The County Council objected to this application on transport related grounds on 20th November 2014. A subsequent submission on behalf of the developer (Technical Note, 10 December 2014, Mode Transport Planning) has satisfactorily addressed all reasons for objection.

In relation to accessibility, the Oxford-Cowley railway line severs this development from nearby bus stops at Minchery Road, from the local primary school and from nearby shops at St Nicholas Road. The provision of a short pedestrian tunnel / underpass or a bridge would provide much improved connectivity for the new residents, not only to a more frequent bus service but also the school and shops. If such a link could not be provided then a contribution at the rate of £1000, per additional dwelling would be sought to boost bus services on the Oxford – Wallingford corridor. This would be used to procure additional daytime or evening journeys, to be operated in a commercial manner following a period of pump-priming support.

In this case of the Littlemore housing application, an additional bus would be required to procure an extra hourly bus service off-peak and an hourly service evenings and on

Sundays. The £1,000 per additional dwelling figure is benchmarked against requests for additional bus services in the adjacent part of South Oxfordshire (for example Benson and Wallingford). The calculations for Littlemore assume procurement of a single additional bus for the Oxford – Littlemore section of route only, probably extending to the Science Park area to turn around.

Should planning permission be granted then the following legal agreements are required to be entered into to provide for mitigation and developer gain:

- Contribution to the transport components of the CIL Regulation 123 list of Oxford City Council are appropriate for this area, and should include roundabout replacement or re-phasing of traffic signals at the Littlemore roundabout on the A4142.
- Should it not be possible to provide a pedestrian / cycle route from the development to Minchery Road then a contribution at the rate of £1000, per additional dwelling should be made to boost bus services on the Oxford – Wallingford corridor.
- Agreements will need to be entered into to contribute to the public realm to create pedestrian infrastructure, commensurate, with the proposed residential use. This includes footways across the site frontage and routes through to connect to other residential and employment areas.

Should permission be granted, the following conditions are recommended for this outline application:

- Additional pedestrian and cycle access points, are required to ensure the site is accessible and, therefore, has a chance of meeting the sustainability objectives, outlined in the Transport Assessment and Travel Plan. This to be secured through the provision of drawings to the LA and the approved drawings implemented by the developer, through agreement.
- Prior to commencement, a detailed drainage design, for the management of surface water, should be submitted to and approved by the local planning authority.
- Prior to commencement, details of finished floor levels, surrounding ground levels and peak flood level should be submitted to and approved by the local planning authority.
- Access Design & Vision splay details.
- Turning Area & Car Parking.
- Cycle Parking Facilities.
- Construction Traffic Management Plan (CTMP).
- Travel Plan

County Council Infrastructure: If permitted, the proposal will impact upon various County Council related infrastructure and services. To address these, CIL revenue would be necessary towards the following non-transport infrastructure.

- Extensions to existing primary schools
- Extensions to existing secondary schools
- Extensions to special needs accommodation
- Extensions to existing 6th form schools
- Improved capacity and accessibility of Westgate library
- Improved capacity and accessibility of early intervention centres

- Improved capacity and accessibility of existing children's centres
- Older people day centre and learning disabilities day centre in West Oxford

Ecology: The District Council should be seeking the advice of their in-house ecologist who can advise them on this application.

Thames Water Utilities Limited

Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. Should the Local Planning Authority look to approve the application, Thames Water would like a 'Grampian Style' condition imposed which seeks the development of a drainage strategy detailing on and off-site drainage works.

Natural England

No objection subject to conditions. This application is in close proximity to the Iffley Meadows Site of Special Scientific Interest (SSSI). However, given the nature and scale of this proposal, Natural England is satisfied that there is not likely to be an adverse effect on this site as a result of the proposal being carried out in strict accordance with the details of the application as submitted.

A detailed SUDS plan must be brought forward at the detailed design stage. This SUDS scheme must use a variety of techniques to ensure that the run-off from the site remains at Greenfield run-off rates. The SUDS must be installed early in the construction process.

This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application.

Third Parties

Letters have been received from the following addresses.

- 30 Dudgeon Drive; 7, 10, 12, 13, 14, 16, 19, 20, 22, 32, 38a, 39 49, 55a, 56, 64, 65, 66, 74, 77 St Georges Manor; 1 Mandlebrote Drive; 13, 18, 17, 19 (Radcliffe House), 75, 76, 78 (The Crescent); 57 (Newman House), 84 (The Old Gate Lodge) Mandelbrote Drive; 4, 20 Oxford Road; 19 Pheasant Walk; 11 Yeftly Drive

Individual Comments:

The main points raised were:

- Broadly welcome the development of houses and flats (particularly affordable housing) on this unused piece of land; although there are general concerns about the impact on local infrastructure such as schools, NHS services and Public Transport
- Strongly oppose the proposed development
- The development would not match the character or meet the needs of Littlemore
- The properties do not have normal driveways or places for parking cars and have to resort to a design of residences that sits close to the street line and uses the ground floor for parking. This is not in keeping with the rest of Littlemore.

- St Georges Park is private land and there is a general objection to the creation of an open accessed thoroughfare and public footpaths through this site
- There is inadequate infrastructure to support high density residential development of this type.
- The development will have a high car dependency including two or more vehicles for family accommodation
- The traffic on Armstrong Road, and Oxford Road is already overloaded as is the day time parking, and the proposal will increase congestion.
- The access and egress from the new development onto Armstrong Road cannot accommodate the existing housing.
- More detail is needed on improvements to public transportation in the area to ease increase in private transport
- There should be access through to Oxford Science Park as required by the Policy
- The area is a natural green skirt to Littlemore and should remain as such
- Residential accommodation next to the busy A4074 would not be desirable
- The local schools are unable to serve existing children and classroom sizes are already too large.
- The site extends into an area of flood plain.
- The proposal will impact on one of the few remaining natural wildlife areas in Oxford.
- The site would be better used for employment and specifically to make Littlemore a renowned medical research and specialised medical treatment community.
- The sewage system is currently at capacity
- The amount of open space seems inadequate for a development providing this number of dwellings
- There are slow worms on site
- The provision of 50% assisted housing seems excessive and above the national average and should be resisted
- The plans are the same as those shown at the public consultation and undermines any claim which the applicants may make to have meaningfully consulted local residents
- The proposal could increase the local crime rate and have an wholly negative effect on the houses and apartments
- The proposal will have an adverse impact on views from properties in St Georges Manor which have enjoyed the semi-rural nature of the area for the past 15 years
- The development will have an adverse impact upon the Grade II listed building in St Georges Manor

St Georges Park Residents Association

• *Objection 1: issues particular to St Georges Park*

St Georges Park is private estate comprising of Grade II listed buildings and new build homes. The residents pay for all facilities through a service charge to the management company. There appear to be two pedestrian paths and cycle ways through St. Georges Park. We will become the default public path to Sandford Road.

The proposed plan does not indicate clear provision for play areas and we would in effect become a public park and recreation ground for a very dense development.

There is pressure on parking on Armstrong Road. Double yellow lines were recently painted and each weekday all available space is taken. We would inevitably have a spill over from the development to our parking areas.

We currently have problems with fly tipping. This problem will be exacerbated.

We have a very low incidence of crime on the estate. Unfettered access through our grounds by densely packed 270 households is completely unacceptable.

We are preserving our local heritage and conserving the unique character of a former Paupers Asylum. We would ask that we are consulted about development within the former curtilage of this institution.

There are no indications that English Heritage has been consulted.

- *Objection 2: Infrastructure*

The assumptions and the consequences on the local road network have been queried. This could be mitigated by having a completely separate access to the development from A4074 and Grenoble Road end.

The public transport system is appalling. Some bus routes referred to in the plan have been withdrawn and Stagecoach have announced the closure of evening and Sunday services from mid-2015.

We note that section 106 funding is being used to build affordable housing. There appears to be no consideration to other elements that create a sustainable community with sufficient and accessible local services.

These houses will be served by a primary school that is already oversubscribed; no local primary health facilities or convenience stores.

They will be built on a flood plain and we note Thames Waters comments on lack of capacity to dispose of waste water and sewage. Some homes in St Georges have poor water pressure and other households make demands on the fresh water supply as they require booster pumps. We ask that Thames Water is consulted on this aspect.

- *Objection 3: wider impact*

Access to the eastern bypass is currently dangerous. Cars are parked on both sides of the road and there is no clear line of sight at the last stretch of Oxford Road. The transport plan refers to accidents caused by driver error. Traffic density and road design can reduce this risk. The proposal seems to suggest that 270 households, most of whom will require cars, will not add to the problems at this roundabout.

Given the floods in Oxford in recent years the disappearance of a flood plain does not augur well.

A highly dense residential development in an area of deprivation will have a negative social impact.

Finally, we understand the pressures for housing in Oxford but there seems to be little understanding and planning for an improved quality of life in the area as well as on the proposed development.

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