

Application Reference: P22/V1917/LDO

Location: Milton Park Milton Abingdon

13 January 2023

Summary of the latest comments received following statutory consultation 24 August to 10 October 2022. A full copy of all the comments made can be seen online at:

<https://data.whitehorsedc.gov.uk/java/support/Main.jsp?MODULE=ApplicationDetails&REF=P22/V1917/LDO>

Consultee	Response Summary	Proposed Actions/Response
Milton Parish Council	<p>Concerns:</p> <ul style="list-style-type: none"> • Echo the Police concerns regarding crime and anti-social behaviour and the need to do everything possible to alleviate it. • Thames Water say the present water network infrastructure will not accommodate the needs of the development. • The Environment Protection Team highlight the impact of artificial light. There is already light pollution from the park with many lights being left on in buildings overnight. • There is some noise impact at times and air pollution, which can only increase with expansion. • Concerns regarding nature and road infrastructure around the park. • Kelaart's Field is of archaeological importance and must be left to nature and never built on. • The park has become a place for technology and small trades do not appear to be catered for. We are losing 	<ul style="list-style-type: none"> • LDO amended in response to police comments (please see the response to Thames Valley Police Crime Prevention Officer comments below). • Thames Water comments addressed by condition as requested by Thames Water (please see their comments below). • Lighting - the council cannot control lighting within buildings as it does not constitute development. External lighting is to be controlled by condition where there is potential for biodiversity impacts e.g. beside Moor Ditch. • Noise and pollution - the uses proposed are largely uses that can take place in residential areas without unreasonable disturbance. General

	<p>our trades some of which, when lost, will never be revived. There are some empty buildings which could accommodate small trades.</p> <ul style="list-style-type: none"> • Believe a hotel is not required as there is a large one already which was built under the present LDO. • The car showroom was built without planning permission, although permission was required for the signage. This shows granting this application gives carte blanche to build almost anything. • 75 residential units again sets a precedent for further development. • Please do not grant this application. 	<p>industrial uses can cause noise and pollution and their activities are to be controlled by condition.</p> <ul style="list-style-type: none"> • Direct road improvements and financial contributions are secured to improve highway infrastructure and to improve sustainable travel options including bus service enhancements, and new cycle/footways to Steventon and Drayton. • The LDO does not propose development on Kelhaart's Field most of which is outside the LDO site. • The LDO can allow trade uses. All uses are likely to proceed based on demand for that use. • Residential development other than serviced accommodation is not permitted by the LDO.
<p>Sutton Courtenay Parish Council</p>	<p>No objection.</p> <ul style="list-style-type: none"> • Request no five storeys buildings on the Sutton Courtenay side of the development. 	<p>Locations for the tallest buildings are in the southern part of the LDO site away from the Sutton Courtenay side of the site.</p>
<p>Drayton Parish Council</p>	<p>Support:</p> <ul style="list-style-type: none"> • Would like to see the permissive footpath linking Drayton footpath 192/12/20 to Steventon bridleway 299/5/60 re-established and if possible turn into an adopted public right of way. This will allow people to walk between Drayton and Milton Park avoiding B 	<p>This land is outside MEPC and this council's control and therefore, it is not possible to insist on the permissive path being re-established. However, the LDO does make provision for a new cycle/footway between Drayton and Milton Park and closely linking to the off road route on to Abingdon.</p>

roads and in accordance with the Drayton neighbourhood Plan.



Didcot Town Council

No concerns about the proposal.

Residents

19 letters of objection have been received as follows:

Need for the Development:

- Is the additional space needed? Milton Park appears to be operating under capacity with a number of under-utilised and empty buildings and working from home pattern do not appear to have been considered.

- The LDO site is allocated for employment uses in the Local Plan (policy CP6). There is no requirement under this policy to restrict the employment uses. Uses are likely to

	<ul style="list-style-type: none"> • Any agreement to extend the LDO should be based on increasing the success of Science Vale and the establishment of Milton Park as a national Life Science Centre and no use should be permitted unless it contributes to this. • The permitted uses are too wide. Hotels, private health facilities, car sales, B2 general industrial, B8 storage and distribution, Sui Generis uses and serviced accommodation are likely to detract from its focus on maximizing 'the success of Science Vale' and should not be included in the LDO but be subject to planning applications. • Another hotel does not appear to be needed as the existing hotel has sufficient rooms. • More restaurants do not appear to be needed with current restaurants having closed. • Provision for small businesses and trade business should be made including smaller buildings for their use. <p><u>Residential Amenity</u></p> <ul style="list-style-type: none"> • Increased noise, pollution and disruption for local residents. • 24 hour innovation hub should not be permitted as it could encourage visits by people outside the Milton Park community, detract from village communities, retail provision elsewhere and add to traffic congestion, noise and light pollution. • Working hour restrictions should be applied. • Too much development in the area in recent years with construction work congesting roads and resulting in disturbance to residents. 	<p>come forward on demand and to meet need.</p> <ul style="list-style-type: none"> • Other uses proposed are ancillary to the main employment uses and aimed at supporting those uses and their employees. • The LDO does not prevent small businesses or trade business from using Milton Park. • Hours of use at Milton Park are not currently restricted and it would be unreasonable to restrict hours of use as this would impact on current businesses located at Milton Park. The LDO directs new General Industrial uses to areas away from existing residential uses to minimise disturbance.
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	<p><u>Taller Buildings</u></p> <ul style="list-style-type: none"> • Taller and larger buildings would detract from the character of Milton, Sutton Courtenay and Didcot and be harmful in views from the AONB and the setting of Milton conservation areas village. • The heights in MP5 should be closer to 10m. • Set a precedent for more tall buildings. <p><u>Kelhaart's Field</u></p> <ul style="list-style-type: none"> • The development would encroach onto Kelaart's Field which is a scheduled monument and source of local pride. • Lose the buffer zone between Milton and Sutton Courtenay. This space needs to be preserved and include more planting. And also encroach on Sutton Courtenay. • No building north of Milton Park's current curtilage should be permitted • Impact on a wildlife corridor with a reduction in biodiversity. <p><u>Traffic, Travel and Parking</u></p> <ul style="list-style-type: none"> • Exacerbate traffic movements including HGV movements through Milton village. • The local road infrastructure is insufficient to accommodate additional traffic movements and will result in increased congestion including from the A34 to the Milton interchange and into Milton Park and at the Milton village access with Milton Park. • The speed limit from Milton Interchange to Milton Park should be reduced to 20mph. 	<ul style="list-style-type: none"> • The heights of buildings adjacent to the conservation area and closest to existing houses are to remain as already permitted but with new 10 or 15m landscaping buffers to the northern edges of the site. • A Landscape and visual impact assessment does not identify any unacceptable landscape or visual impacts. The council's landscape officer has no objections. • The LDO does not propose development on Kelhaart's field or the fields between Milton and Sutton Courtenay. • The boundaries of the current LDO are not expanded by this new LDO but remain the same. • Biodiversity net gains are proposed and secured by conditions. • Milton village is subject to a 7.5T weight restriction and consequently HGV movements through the village are unlikely to increase. • OCC consider the road infrastructure which includes improvements such as HIF1 can accommodate the increased traffic. • Milton Park is already subject to a 20mph speed limit.
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	<ul style="list-style-type: none"> • A train service should be provided from Didcot to Milton Park and a new station provided before any enlargement. • Inadequate public transport being infrequent and unreliable. Improved bus services should be a priority to reduce congestion. • Need cycle lanes. • Circuitous bicycle route around Sutton Courtenay lengthens the journey time from Abingdon • Priority should be given to pedestrian access from the west of the site. There is no appropriate pavement for significant sections of the road running along the road which the Park Gym and The Plum Pudding pub are located. • Need to change mindsets to reduce single person car journeys. • Reducing car parking will push parking into the Milton village. • Need more electric vehicle charging points. <p><u>Accessibility</u></p> <ul style="list-style-type: none"> • Due regard has to be given to the Equality Act 2010, wherein disability is a protected characteristic. The footway beside Park Drive from the Milton Interchange and junction with High Street is very poor being uneven in places and on a steep slope from the carriageway to the outer edge of the footway. It is not currently accessible for wheelchair users. Obligations should be secured in a S106 to ensure adequate accessibility. <p><u>Renewables</u></p> <ul style="list-style-type: none"> • No mention of rooftop renewables 	<ul style="list-style-type: none"> • Milton Park is subject to a good public transport service and currently served by cycle paths from Didcot, the A4130, Sutton Courtenay Lane and across the green buffer between Milton Park and Sutton Courtenay. The LDO seeks to provide new cycle lanes as part of developments and secures a financial contribution towards a cycle path between Milton Park and Steventon as identified by the Local Plan (policy CP18a), and also to Drayton. • Pavements leading to the Park Gym and to the Plum Pudding PH are considered adequate. • Parking restrictions are part of the proposed mitigation. • Electric vehicle charging points for cars and E.bikes are a requirement of the LDO. <ul style="list-style-type: none"> • This footway is outside the LDO site area and this matter has been drawn to the attention of OCC as highway authority with a request that this issue be reviewed and if necessary remedied.. <ul style="list-style-type: none"> • Renewables are encouraged including roof top renewables (except wind
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	<ul style="list-style-type: none"> No mention of providing a waste-heat steam or hot water pipe from Didcot power station which could contribute to useful 'cool side' for the power station and provide heating to Milton park buildings. <p><u>Other Matters</u></p> <ul style="list-style-type: none"> Benefits for the wider community should be provided such as gym concessions and bus passes and sports facilities such as tennis courts provided Lack of worker's housing for early career staff within walking distance hinders hiring. Set a precedent for more residential development on the Park which could gradually become a residential development. Seems unnecessary to have a further LDO when one is already in place. The LDO would allow a range of development without having to submit a planning application and the scrutiny that would involve. The landscaping at the Milton Gateway is unmanaged and gives a poor first impression that is out of keeping. Appropriate landscaping and management is needed to improve the public realm and create a "proper" gateway. <p>One resident repeats the comments made by Milton Parish Council.</p> <p>One resident whilst raising other objections, has no objection to taller buildings.</p>	<p>turbines which could impact on air traffic safety). The LDO sets parameters for development with the LDO site boundaries and cannot address development that may involve third party land such as the power station.</p> <ul style="list-style-type: none"> Concessions to use facilities such as the gym is not a material planning consideration. Such offers are a decision for operators of facilities. Any application for housing development would be subject to a planning application and considered on its merits. Scrutiny of planning merits is undertaken as part of the LDO process – please see the Statement of Reasons in Appendix 3.
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	<p>One resident whilst objecting asks that should the LDO be granted it should not permit taller buildings or residential accommodation.</p>	
<p>Fedex Express UK</p>	<p>Comments:</p> <ul style="list-style-type: none"> • Fedex has operated from the site since 1981 without any restriction on operating hours. The distribution centre operates 24/7 which is essential to meeting customer requirements. It has two concerns: <ol style="list-style-type: none"> 1. Currently Fedex is in Zone A in the adopted 2012 LDO but the proposed LDO changes this to Zone B which does not allow Class B8 uses. This is considered unjustified given there is no change in the relationship between Fedex and adjacent sites. Request Fedex is reallocated to Zone A. 2. The draft LDO's focus is on science and technology research and development should not come at the expense of other employment activity, specifically in the industrial and logistics sector which across the UK are significant employers and contributors to the UK economy. Logistics operators, such as FedEx, provide direct support to and are important to the success of science and technology research and development activities that are central to the 2040 Vision for Milton Park. • Request that the general extent of Zone B is reviewed to ensure land allocated in this Zone is only justified where it serves the purpose stated at LDO 'Table B: Permitted Uses in the LDO Area' of avoiding potential conflicts with residential amenity and not reduce the 	<ul style="list-style-type: none"> • The LDO has been revised to keep Fedex in Zone A and clarity is provided in the LDO that existing Use Classes B2 and B8 in zones B and C can seek to extend their premises should they wish to.

	<p>supply of land that could otherwise be available for Class B8 uses.</p>	
<p>National Highways</p>	<p>Comments:</p> <ul style="list-style-type: none"> • National Highways is not concerned with the changes in proposed development or with the proposed highway mitigation to be secured through a S106 legal agreement with VOWH and OCC as the highway authority. However, National Highways is concerned that the mitigation is delivered in good time so that queuing on Park Drive does not impair traffic operations and safety at Milton Interchange Roundabout and create safety issues on the A34 southbound off-slip to Milton Interchange Roundabout. • National Highways supports the 'monitor and manage/provide' approach to providing the identified mitigation. • <i>The Milton Park LDO Monitoring and Review Framework for Highway Mitigation' should:</i> <ol style="list-style-type: none"> 1. Confirm that the courtesy-related queuing on Park Drive, stretching from High Street back towards Park towards Milton Interchange, will be separately monitored to the eastbound queuing generated downstream on Park Drive related to the junction of Park Drive and Western Avenue. 2. Confirm that the thresholds for the courtesy related queuing on Park Drive will be similar to those already proposed elsewhere. 3. Correct paragraph 1.3.21 for missing and incompletely described queue length survey locations compared to those shown in Figure 3 (previously 	<p>National Highways confirms the amended transport assessment addresses these points.</p>

	<p>Figure 2) and included in Table 2. National Highways expected paragraph 1.3.21 to include the below:</p> <ul style="list-style-type: none"> ○ Eastbound on Park Drive from Park Drive / Western Avenue / Park Square roundabout; ○ Southbound on Western Avenue from Park Drive / Western Avenue / Park Square roundabout; ○ Westbound on Park Drive from Park Drive / Western Avenue / Park Square roundabout; ○ Westbound/southbound on Park Drive from Milton Interchange; ○ Southbound on High Street from Park Drive / High Street junction; and ○ Eastbound on Park Drive from Milton Road / Sutton Courtenay Road / Park Drive roundabout. 	
<p>Oxfordshire County Council</p>	<p>Highways</p> <p>No objection:</p> <p>Since the previous formal response, dated 11th October 2022, (this response is available on the council's web site), OCC Highways have been in discussion with the transport consultant regarding the outstanding issues that are required, for the previous holding objection to be removed.</p> <p>For transparency, each issue has been summarised below along with the narrative of discussion and OCC's position:</p> <ol style="list-style-type: none"> 1. There was some confusion over the state of the Transport Assessment (TA), as originally its file name stated it was a 'DRAFT' TA. There were numerous elements that we asked for further clarification on or additions to be made to the document, which we 	

needed to see. Whilst these matters were discussed in meetings, OCC required details to be included within the TA for transparency. These requirements are listed here, for ease of reference followed by OCC commentary:

- a. OCC have agreed an approach for a 'worst case' scenario, which utilises pre-Covid traffic baseline data and does not factor in any modal shift trends, however, we require this be detailed within the TA, alongside the results of such a scenario.
 - i. This has been detailed in paragraphs 9.7.15 – 9.7.17 of the TA.
- b. OCC require further explanation on how the growth/committed development trips have been allocated to the short, medium and long-term scenarios for transparency. In paragraph 9.4.4, just taking a 1/3, then 2/3 and all of the planned growth through the modelled area appears to be a bit arbitrary and there may be justification for looking at the planned growth sites trajectories/district housing monitoring reports, to ascertain if the split between the periods of growth will be equal. This needs further justification.
 - i. This has been added to section 9.4 of the TA.
- c. In paragraph 9.5.2. the wording is confusing. This section of the TA confirms the base year Milton Park model network being modified to account for the proposed improvements at

	<p>Milton Interchange (left turn filter lane from A4130 eastbound, and additional lanes exiting to Milton Park), which is associated with proposed development in the area. It also is modified to include the A4130 widening schemes either side of Milton Interchange, which on the east side, is part of the HIF proposals. OCC requires revised wording and clarification as to what year these infrastructure changes are that are included in the model, as they should not be in the 'base' year, but would be in a future forecasted year.</p> <ul style="list-style-type: none">i. This has been updated. <p>d. Paragraph 8.6 mentions Covid-19 Implications as its title, however there is no narrative underneath, which appears to be an error. Clarification on this point is required.</p> <ul style="list-style-type: none">i. Even though this section has now been removed, this is acceptable, given that reference is made to their latest sets of Vivacity data and data going back prior to Covid, which has been considered. It would just repeat narrative already covered. <p>2. The Monitoring Review Framework (MRF) also requires further input, as although we have covered some of it off in discussion, it must be included in the report itself, again for transparency. We cannot fully agree the monitoring approach and subsequent setting</p>	
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out of the s106 before we are satisfied with the approach. Items include:

- a. Explanation of how the thresholds were determined for both step 1 and step 2 is provided, however, for transparency, this should be further expanded upon in the report. As we have stated before, using queue levels as opposed to flows might be a better approach. In 1.4.3 it says if step 1 (flows) are triggered but step 2 (queues) isn't, then step 2 (Q) will be reassessed at increments of 5% flows. What happens if it's the other way around? What if flows don't increase, but queuing does? This is a key concern. OCC do not believe Q lengths should only be taken when flows reach a certain point, it needs to be more frequent. Are vivacity cameras (or other technology) able to be put at the relevant queue length locations and if it senses queues reaching that point, it triggers the next stage? Of course, there is still a question of how many times does it need to reach that point, how many days per week etc.
 - i. See the narrative under point d). This has been addressed and queue length surveys will also be included in stage 1 of the monitoring.
- b. The use of weekday average traffic flows, which includes Monday and Friday has been discussed, as they can often see a lower flow, which would impact on the average and impact

the analysis. Your response to this point should be included.

- i. This has been included in paragraph 1.3.12 – 1.3.14. For the purposes of monitoring traffic volumes at Milton Park it is proposed that two-way peak period (07:00 – 10:00 and 16:00 – 19:00) Monday to Thursday weekday average flows serve as the metric for Stage 1, which OCC deem acceptable.
- c. The situation where flow actually goes down, but queues go up as less cars can get through per hour, as they are held up elsewhere on the network, has also been discussed, but your response should be included.
- d. The applicant has now made stage 1 a double prong approach, whereby the traffic flows and queue lengths are looked at in tandem. On discussion with the applicant, an agreement on how often these thresholds have to be met and for what duration, for stage 2 to then be triggered, was discussed. If number of days in a month by month review was used, this may be overly complicated, as would it be a rolling month or calendar month by month? There are also a lot of factors that could change month by month, to affect flows/queues. Therefore, using a 2 consecutive week would be OCC's preference, with the thresholds being met for 2 days in a week, given that Monday and Friday are quieter anyway.

	<ul style="list-style-type: none"><ul style="list-style-type: none">i. Section has been added to the MRF under 1.4.5 to this effect.3. As part of the MRF, you should also detail your commitment to monitoring the car parking surrounding the site. We need to protect against the risk that there could be an impact on the highway in a few key places and therefore we needed a commitment from MEPC that there is a review mechanism in place to ensure this doesn't become an issue. The review period of the LDO was acknowledged as playing an important role in this, however, if there is a requirement for a TRO, this commitment must be agreed and acknowledged in the MRF.<ul style="list-style-type: none">a. This has been included, however, OCC noted the narrative did not say they will implement the TRO consultation process. This will be an expectation and will be drafted in the s106. We will include this in the s106 for signing.<ul style="list-style-type: none">i. Section 1.6.1 of MRF has been updated accordingly.4. OCC require costings for the Kelaart's Field link to Drayton Road and the Milton/Steventon Cinder track, before we can ascertain any contribution should that be required.<ul style="list-style-type: none">a. There is a commitment to contribute to the Cinder Track and Kelaart's Field link in the TA, although the section is still very vague.<ul style="list-style-type: none">i. The costing estimates that have since been provided, whilst not required for OCC to remove their holding objection,	
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are required to inform the contribution being sought through the s106. In their current form, these are extremely limited in their detail and we have no scheme proposals to check them against. For us to send these across to our QS team, we would at least expect to see details on type and amount of surfacing, lighting requirements, land assembly, utilities and site investigations, to name but a few.

By the applicant's own admission, they acknowledge that the list of unknowns is significant and caveat the costings with the following:

'...From past experience these unknowns tend to significantly impact a project both in terms of cost and program.'

It is therefore prudent to ask for further detail for both the Kelaart's Field to Drayton Road route and the Cinder track. Not only do we have to see some sort of scheme proposals, but there also has to be consideration of potential constraints that will need addressing, such as bridging of watercourses, gradient issues and archaeological elements and these factored into any costings exercise.

Once these have been received, we will require time for our QS team to check them, so please do bear this in mind during the s106 negotiation discussions.

- b. Despite the HIF1 scheme delivering many active travel links/routes, it is all about

maintaining transparency and therefore, these should be highlighted in the TA, as a narrative for why MPEC are not delivering them.

- i. Further information has been provided from 10.3.15 onwards in the TA, in relation to forthcoming walking and cycling improvements in the vicinity of Milton Park, which are to be considered.

5. We required you to address objection point 1 from our response, in the TA, which refers to the requirement for junction capacity analysis on two of the junctions to the east of the site. It was discussed and agreed upon, but it should be justified in the TA.

- a. This has now been included.

6. We require plans for the mitigation works, being proposed as part of the worst-case scenario, as well as the plans for the new link between Western Avenue and the High Street and flare length extension on northern arm of Park Drive / Western Avenue / Park Square roundabout.

- a. Included. These are high level 'in principle' mitigation proposals.

In relation to the National Highway comments and associated alterations, changes have also been made as follows:

- Monitoring and Review Framework (MRF) 1.3.21: Minor text changes to bullet point list of queue length survey locations, confirming that the courtesy queuing on Park Drive will be monitored; and

- Monitoring and Review Framework 1.3.23: Text added in relation to courtesy queuing on Park Drive, confirming that this will be monitored and that the thresholds for this section mirror that of the Park Drive W1 trigger points outlined in Table 2.
- Text has been added to Section 2.4 of the TA.

Other comments:

Section 1.3.26 of MRF has been updated accordingly to reflect our requirement to secure all mitigation works in this s106, whether triggered in the future or not.

S106 needed to secure the following:

Contribution	Amount	Index	Details
Strategic highways	TBC	Baxter	Strategic highways infrastructure within the Didcot area
Public Transport Services	TBC	RPIX	Towards bus services serving Milton Park
Public transport infrastructure	TBC	Baxter	Upgrading Milton Park bus stops
Traffic Regulation Order (TRO)	TBC	RPIX	Towards implementation of a controlled parking zone

				(CPZ) and or parking restrictions on the highways adjacent to Milton Park.
	Travel Plan monitoring	TBC	RPIX	The Travel Plan will contain a focus on the Decide and Provide monitoring and evaluation requirements.
	Public Rights of Way	TBC	Baxter	Towards the improvement of pedestrian and cycling routes in the vicinity of the site.
	<ul style="list-style-type: none"> • Section 278 Agreement for works within the highway, to include (timing to be confirmed within the s106), but not necessarily limited to: <ul style="list-style-type: none"> ○ Delivery of a link road between High Street and Western Avenue - the exact alignment and form to be agreed when deemed appropriate by the monitoring and review process – delivered within a strategic area safeguarded for highway mitigation; and 			

- Extending flare length on northern arm of Park Drive / Western Avenue / Park Square roundabout. The length of flare extension is to be agreed following modelling undertaken as part of the monitoring and review process.
- Indicative modelling of a 'worst-case' demand scenario suggests that full signalisation of the Park Drive / Western Avenue junction and flare widening on the southern approach arm of the Milton Road / Park Drive roundabout may be required.
- Off-site walking and cycling improvements to existing Public Rights of Way and other routes within the highway.

Drainage

No objection.

- The site flood risk assessment FRA includes surface water advice and flood control requirements and these are suitable at this stage of the project. Expect to see detailed designs for individual parts of the project.

Archaeology

No objection:

- The submitted LDO makes appropriate provision, secured by conditions 22-24, for the area of known archaeological sensitivity identified at MP9 of the LDO development area.

Minerals and Waste

No objection:

	<ul style="list-style-type: none"> • The site does not fall within a Mineral Safeguarding Area or a Mineral Consultation Area. The LDO would not affect any safeguarded Mineral Infrastructure. • A safeguarded waste management site falls within the area covered by the LDO. Therefore, Policy W11 of the Oxfordshire Minerals and Waste Local Plan Part 1 – Core Strategy should be considered. This Policy states that where the development would directly or indirectly prevent or prejudice the use of a site safeguarded for waste management, the development will not be permitted unless: <ul style="list-style-type: none"> ○ The development is in accordance with a site allocation for development in an adopted local plan or neighbourhood plan; or ○ Equivalent waste management capacity can be appropriately and sustainably provided elsewhere; or ○ It can be demonstrated that the site is no longer required for waste management. • The adopted Vale of White Horse Local Plan 2031 Part 1: Strategic Sites and Policies shows that most of the area covered by the Local Development Order has been allocated as a strategic employment site. <p>Landscape and Green Infrastructure The district council landscape officer should be consulted.</p>	<ul style="list-style-type: none"> • Policy W11 relates to a wood recycling/transfer company that once occupied premises on Milton Park. In 2015 the company relocated to new premises elsewhere in Abingdon. The LDO therefore, does not conflict with policy W11 of the Minerals and Waste Local Plan Part 1, as it is being provided elsewhere. OCC has now confirmed it has no objection in this respect. (This matter is addressed in greater detail in the Statement of Reasons (see Appendix 3).
Thames Water	<p><u>Waste and Surface Water Comments:</u></p> <ul style="list-style-type: none"> • Thames Water has been unable to determine the foul water infrastructure needs of this application. Request conditions to address this. 	

	<p><u>Water Comments:</u></p> <ul style="list-style-type: none"> Thames Water has been unable to determine the existing water network infrastructure to accommodate the needs of this development. Request a condition to address this. <p><u>Supplementary Comments:</u></p> <ul style="list-style-type: none"> A drainage strategy should contain the points of connection to the public sewerage system as well as the anticipated flows (including flow calculation method) into the proposed connection points. This data can then be used to determine the impact of the proposed development on the existing sewer system. If the drainage strategy is not acceptable Thames Water will request that an impact study be undertaken. <p><u>Conditions:</u></p> <ol style="list-style-type: none"> <i>No occupation until Thames Water confirm foul water capacity exists or a phasing plan is agreed or the foul water network has been upgraded.</i> <i>No occupation until Thames Water confirm surface water capacity exists or a phasing plan is agreed or the surface water network has been upgraded.</i> <i>No occupation until Thames Water confirm all water network upgrades have been undertaken or a phasing plan is agreed or the foul water network has been upgraded.</i> 	<ul style="list-style-type: none"> Addressed by condition 9
Drainage Engineer	No objection:	

	<ul style="list-style-type: none"> The supporting technical assessments and LDO have been reviewed and are considered to suitably address matters concerning flood risk and drainage. 	
Air Quality Officer	<p>No objection:</p> <ul style="list-style-type: none"> The air quality report has considered the impacts of dust and the operational phase upon air quality and modelled predicted impacts and compared them with local monitored levels and Defra background maps. The report predicts that the proposed development will not have any significant impacts on air quality in the immediate and surrounding area, and that dust emissions during the construction phase can be adequately controlled with mitigation. <p><u>Conditions</u></p> <ol style="list-style-type: none"> <i>Dust management plan to form part of the construction environmental management plan.</i> <i>Provision of electric vehicle charging points (EVCP).</i> 	<ul style="list-style-type: none"> Included at condition 25 EVCP included as condition 21
Contaminated Land Officer	<p>No objection.</p> <p><u>Conditions</u></p> <ol style="list-style-type: none"> <i>Investigation for contamination before the development commences and if necessary, to produce a contaminated land remediation strategy before the development commences.</i> <i>The contaminated land remediation strategy to be completed before the development is occupied and a verification report submitted to the local planning authority for approval.</i> <i>If contamination not previously identified is discovered during development, a programme of investigation</i> 	<ul style="list-style-type: none"> Conditions included as conditions 26 and 26a

	<i>and/or remedial works submitted to and approved in writing by the local planning authority.</i>	
Environmental Protect Team (noise)	<p>No objection:</p> <ul style="list-style-type: none"> The measures in the artificial lighting and noise assessments should be implemented. 	Addressed in conditions 6 and 28
Waste Management Officer	No comments.	
Landscape Architect	<p>No objection:</p> <ul style="list-style-type: none"> In landscape terms, the main area of change is the additional proposed building heights. This proposed additional height has been explored and adjusted by using digital modelling to restrict the higher heights to the least sensitive southern areas of the site. The plans and associated documents contain clear parameters with regards to the relationship of plant on roofs and building heights, with roof plant included within the height parameters on the more sensitive northern and western areas of the site. Wider and additional areas of planting have been proposed on the northern side of the site to help mitigate the impact of the proposed development on its interface with Milton and Sutton Courtenay villages. Other LDO documents such as the Design Guidance, additional guidance has been created with regards to the expected design quality of the site. With regards to landscape items such as hard and soft landscape design, building colour, building plant and service design are incorporated into the guidance. 	

	<ul style="list-style-type: none"> • Section 3.86 of the Design Guidance refers to “deck parking should be a maximum of a single level in height”, this could be too restrictive. There are good local examples of deck parking, such as those at Oxford Science Park being 2 storey’s, with slightly sunken ground floor parking. • The LVA needs updating to reference the current Council Design Guide which is now the Joint Design Guide. 	<ul style="list-style-type: none"> • Decked parking is now clarified in the LDO as three floors including the ground floor.
Forestry Officer	<p>No objection:</p> <ul style="list-style-type: none"> • Support the proposed tree management strategy at appendix 4 of the LDO. 	
Urban Design Officer	<p>No objection:</p> <ul style="list-style-type: none"> • The LDO needs to refer to the 2022 adopted Joint Design Guide. • Clarify on the plans where cycle connections lead to. • In terms of street design consider not only raised tables (which can be unattractive) but speeds can be controlled by reduced forward visibility, physical and optical narrowing including narrower carriageways and different surface materials. • Consider courtyard type designs for offices. • Consider sinking ground level parking which would allow to go higher than one level. Make sure however to provide visual screening via landscaping to soften the visual impact of decking parking. 	<ul style="list-style-type: none"> • Relevant amendments made to the LDO Design Guidance.
Countryside Officer	<p>No objection:</p> <ul style="list-style-type: none"> • Condition 2 refers to the ecological baseline information for the LDO area being kept up-to-date by 	

	<p>a regular review of the baseline surveys by a suitably qualified ecologist, not less than every two calendar years from date of adoption of the Order. This is to include an audit of the management prescriptions identified in Section 5 of the Milton Park Local Development Order 2022: Biodiversity Strategy prepared by Tyler Grange (19 November 2021) (Ref: 14122 HM CW) for retained habitats and newly created habitats on Development Plots with the surveys submitted to and approved in writing by the Local Planning Authority. Should the review identify changes in the baseline conditions, the relevant ecological survey(s) shall be undertaken by a professional ecologist and submitted to the Local Planning Authority prior to the commencement of further development in the survey area(s).</p>	
<p>Natural England</p>	<p>No objection:</p> <ul style="list-style-type: none"> Do not consider that this LDO poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation. 	
<p>NHS Integrated Care Board</p>	<p>Comments:</p> <ul style="list-style-type: none"> Insufficient consulting rooms to cope with increased population growth as a direct result of the increase in dwellings (the 75 units of serviced accommodation). Seek a financial contribution of £64,800 towards consulting room capacity in this PCN area. 	<ul style="list-style-type: none"> The s.106 agreement secures the financial contribution – payable before first occupation of any serviced accommodation.

<p>Crime Prevention Officer – Thames Valley Police</p>	<p>Comments:</p> <ul style="list-style-type: none"> • Disappointed that the prevention of crime and disorder has not been a significant consideration within the proposals and ask that the documents within the LDO are revised to include a requirement for developers to explicitly incorporate crime prevention through environmental design throughout the development. • The Protect duty/PALS (Publically Accessible Locations) legislation is due to come into force imminently. This will place a legal obligation on owners and operators of Publicly Accessible Locations (PALs) to improve the protection of the public from terror attacks and criminal activity. It is far easier, and a lot more cost effective, to ensure that all efforts to design out crime and design in protective measures are taken from the outset, rather than having to make changes and redesign after development has been constructed. It is vital that all developments should have to consider and address these issues from the outset, and prior to permission being granted. Recommend specific guidance is included within the LDO regarding this issue, particularly around public spaces. • Strongly recommend consideration is given to requiring developers to consult and follow all guidance provided by Secured by Design. • The LDO Design Guidance should include a section on crime prevention and public safety. • Recommends changes to the LDO Design Guidance as follows: 3.16 – Omit “long” from this statement. Blank facades even of a short length support crime and anti-social 	<ul style="list-style-type: none"> • The majority of the comments below are positively addressed in revised LDO Design Guidance (see Appendix 3). Officers are also conscious that Milton Park has its own 24 hour security patrols. Where the Design Guide has not been revised, reasons for not doing so are explained below. • Secured By Design goes beyond planning requirements and the definition of development e.g. security matters such as door locks.
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	<p>behaviour (ASB) by reducing surveillance over the public realm and providing opportunities for graffiti.</p> <p>3.20 - recommend adding "... landscaping, boundary and surface treatments".</p> <p>3.22/3.23 – Guidance should be provided for preventing unauthorised vehicular intrusion onto undeveloped plots or areas where hard landscaping is provided to meet these statements. Failing to do so creates spaces vulnerable to crime, ASB and illegal/unauthorised encampments.</p> <p>3.26 – guidance should be added to require corner plots to have dual aspect windows that "Turn the corner" to maximise surveillance over the public realm.</p> <p>3.51 – Landscape – Requirements for defensible space and planting to temporary residential plots, again to demarcate the change in ownership from public to private or semi-private space, and to afford protection to easily accessible ground floor windows. Defensible space and planting as a buffer along walls also reduces opportunities for loitering and crime such as graffiti.</p> <p>3.58 – Recommend adding a requirement for green infrastructure to be protected from unauthorised vehicle incursion, including vehicles and mopeds/motorbikes. Spaces need to be accessible but only to legitimate users.</p> <p>3.67 or 3.75 – Recommend adding a point that lighting must be considered holistically with tree planting to avoid conflict between trees and lighting, that will not only create shadowing which is attractive to crime and</p>	<ul style="list-style-type: none"> • Officers are not aware of any history of unauthorised vehicle intrusion. • The LDO design guidance discourages blank facades.
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	<p>ASB but also significantly increase the amount of maintenance required.</p> <p>3.82 – add car parking, this should also be well lit.</p> <p>3.83 – Strongly recommend specifically excluding rear parking courts within this guidance. In line with OCC guidance they are undesirable and problematic areas for parking that create significant crime and ASB issues, undermine the security of secure perimeter blocks and are almost always abandoned in favour of parking elsewhere.</p> <p>3.85 – Landscaping should be designed so as not to hamper surveillance – Trees should be of clear stemmed variety with a canopy above 2.2m, and hedge planting should be maintained below 1m.</p> <p>3.86 – Strongly recommend all parking areas should be designed in accordance with Park Mark standards, to ensure opportunities are taken to significantly reduce opportunities for crime and ASB to occur. Recommend asking for good surveillance and lighting (To the same standard as the highway) as well within parking areas. There should also be a requirement for commercial, business and residential parking to be clearly separate and identifiable.</p> <p>3.89 – Strongly recommend wording is amended to “Cycle parking should be covered and secured in line with recommendations of Secured by Design, and be positioned adjacent to building entrances”.</p> <p>3.95 – If it is desirable for refuse storage areas to be hidden and not well covered by surveillance, it is vital that they are secure otherwise there is a high risk of crime, ASB and arson within them.</p>	<ul style="list-style-type: none"> • Need to balance design and potential fear of crime. In this case the balance is considered appropriate and it seems the currently well landscaped Park is not subject to significant levels of personal safety issues.
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	<p>4.36 – Significant concerns with a physical requirement to locate all parking to the rear of buildings, without further guidance to ensure parking provision is safe and secure from crime and ASB. Surveillance may be a significant challenge when parking to the rear of buildings, particularly with the railway line to the rear of these parking areas which reduces surveillance even further. Guidance should be provided as to what type of parking is required that meets the requirements of Secured by Design, and to ensure surveillance is maximised.</p> <p>4.45 – Underpasses are a significant risk area for crime and ASB to occur if pedestrians are required to use them. Vehicles can go underground, but pedestrians must go over ground. I strongly recommend any underpass connection is only for vehicles and not pedestrians. Pedestrian links should be at surface level or over bridges. If the underpass requires pedestrian access, it must be as wide and as short as possible, be very well lit and have a clear line of sight from one end to the other, with both entrances well overlooked by surveillance from surrounding dwellings.</p> <p>4.49 – Connectivity must not undermine security, and any permeability should not be “excessive”, such as through private parking areas or behind plots, where side and rear boundaries are vulnerable to unauthorised entry and burglary attempts.</p> <ul style="list-style-type: none"> • Object to the point requiring security lighting to be PIR motion activated. This type of lighting is not supported by Secured by Design and is proven not to reduce 	<ul style="list-style-type: none"> • Underpasses are not proposed. • The LDO Design Guide references maintaining connectivity to cycle/footways over ‘Kelhaart’s Field’
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	<p>crime, and may even increase the fear of crime. Security lighting should be photoelectric switched “Dusk till dawn” lighting. Motion activated technology that dims light output by up to 50% may be utilised to reduce output when no activity is happening nearby. PIR motion activated lighting may be used for convenience in private areas that are not publicly accessible.</p> <p><u>Conditions</u></p> <ol style="list-style-type: none"> 1. <i>No development is occupied until Secured By Design accreditation has been applied for and approved.</i> 2. <i>Safety/security requirements be included in proposed condition 6 with lighting to highways, footways and parking areas conforming to BS5489-1:2020.</i> 	<ul style="list-style-type: none"> • Secure By Design goes beyond planning requirements e.g. types of locks fitted. A condition would not be appropriate. • It is a matter of balancing skyglow, biodiversity impacts and security. Condition 6 is adequate.
<p>Ministry of Defence</p>	<p>Comments:</p> <ul style="list-style-type: none"> • Milton Park contains areas that are washed over by safeguarding zones that are designated to preserve the operation and capability of defence assets and sites, in this case RAF Benson. • No concerns with the LDO but would wish to be consulted of any potential development within the statutory technical safeguarding zones that surround RAF Benson, which consists of structures or buildings exceeding statutory safeguarding height criteria, and would emphasise that development including open water storage, wetlands or any schemes that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation within the bird strike safeguarding zone associated with RAF Benson, then consultation with the MOD 	<p>None of the height parameters in the LDO exceed the statutory safeguarding height criteria which are 50m or exceeding 11m for wind turbines, and wind turbines are excluded by the LDO and therefore, they would need planning permission.</p>

	should take place. Policy wording that alerts developers to this potential would be welcomed.	
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