

27 July 2023  
L 230727 HR Covering Letter to PINS and LPA



By email only to: [inquiryappeals@planninginspectorate.gov.uk](mailto:inquiryappeals@planninginspectorate.gov.uk)

Harry Ramsey  
E: [harry.ramsey@savills.com](mailto:harry.ramsey@savills.com)  
DL: +44 (0) 1865 269 054

Copied to: [submit.appeal@cherwell-dc.gov.uk](mailto:submit.appeal@cherwell-dc.gov.uk)

Wytham Court  
11 West Way  
Oxford OX2 0QL  
T: +44 (0) 1865 269 000  
F: +44 (0) 1865 269 001  
[savills.com](http://savills.com)

Dear Sir/Madam,

**Section 78 Appeal by Richborough Estates, Lone Star Land Ltd, K and S Holford, A and S Dean, NP Giles, A L C Broadberry against the Refusal of an Outline Planning Application by Cherwell District Council (ref: 21/04289/OUT)**

**OS Parcel 1570 Adjoining And West Of Chilgrove Drive And Adjoining And North Of, Camp Road, Heyford Park**

Savills (UK) Ltd are instructed by our clients, Richborough Estates, Lone Star Land Ltd, K and S Holford, A and S Dean, NP Giles, A L C Broadberry, to lodge a Section 78 appeal against the refusal of an outline planning application (reference: 21/04289/OUT) by Cherwell District Council for the following Description of Development:

*“Outline planning application for the erection of up to 230 dwellings, creation of new vehicular access from Camp Road and all associated works with all matters reserved apart from Access.”*

The refusal of the outline planning application was confirmed in a Decision Notice dated 31<sup>st</sup> March 2023, and was subject to two Reasons for Refusal.

The appeal has now been lodged via the Planning Casework Portal and comprises the following documents:

#### Appeal Documents

1. Appeal Forms, duly signed and completed.
2. Statement of Case, prepared by Savills, dated July 2023.
3. Draft Statement of Common Ground, prepared by Savills, dated July 2023.

#### Application Documents

Please find enclosed a ‘List of Original Application Documents’, which formed the original planning application, alongside a ‘List of Additional Documents’, which were submitted during the determination period. All of these documents have been submitted as part of this appeal.

#### Appeal Procedure

Section 9 of the Appellant’s Statement of Case sets out the following justification for selecting the Public Inquiry procedure:

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.

A subsidiary of Savills plc. Registered in England No. 2605138. Registered office: 33 Margaret Street, London, W1G 0JD





The Appellant has considered the criteria for determining the appeals by way of an Inquiry and considers that this procedure is the most appropriate for the following reasons:

- The nature and extent of evidence to be given will need to be presented by expert witnesses in open inquiry. There is a need for evidence of all parties to the planning appeal to be tested through formal procedure and cross examination by an advocate. This cannot be achieved through the written representations or hearing procedures;
- The issues are complex, and therefore, the Planning Inspector will need to test evidence by questioning and will likely need to seek clarification on specific matters; and
- The Appellant wishes to make legal representations on the Development Plan and Housing Land Supply Position.

The appeal is made on the grounds of refusal by Cherwell District Council for the two reasons stated.

The Appellants have suggested 5 days for an Inquiry based on the key issues considered relevant to determination of the appeal. This timing could potentially be reduced, subject to the Cherwell District Council's position adopted in respect of Housing Land Supply.

I trust that the enclosed information provides you with sufficient information to validate this appeal. Should you have any questions or require any further information, please do not hesitate to get in touch.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Harry Ramsey", written in a cursive style.

**Harry Ramsey**  
Senior Planner

Enc:

- List of Original Application Documents
- List of Additional Application Documents

**OS Parcel 1570 Adjoining And West Of Chilgrove Drive And  
Adjoining And North Of, Camp Road, Heyford Park.**

LPA Application Reference: 21/04289/OUT

Reference No.	Document Title	Prepared By	Document Reference	Date
---------------	----------------	-------------	--------------------	------

<b>Plans and Documents Submitted as Part of the Application</b>				
SD01	Application Forms	Walsingham Planning		24 <sup>th</sup> December 2021
SD02	Covering Letter	Walsingham Planning		24 <sup>th</sup> December 2021
SD03	Site Location Plan	Edge Urban Design	L01	December 2021
SD04	Land Use Parameter Plan	Edge Urban Design	P01	December 2021
SD05	Access and Movement Parameter Plan	Edge Urban Design	P02	December 2021
SD06	Building Heights Parameter Plan	Edge Urban Design	P03	December 2021
SD07	Density Parameter Plan	Edge Urban Design	P04	December 2021
SD08	Landscape and Open Space Parameter Plan	Edge Urban Design	P05	December 2021
SD09	Illustrative Masterplan	Edge Urban Design	P06	December 2021
SD10	Illustrative Masterplan (without annotations)	Edge Urban Design	P06	December 2021
SD11	Design and Access Statement	Edge Urban Design		December 2021
SD12	Statement of Community Involvement	Walsingham Planning		December 2021
SD13	Transport Assessment	Hub Transport Planning		15 <sup>th</sup> December 2021
SD14	Draft Travel Plan	Hub Transport Planning		20 <sup>th</sup> December 2021
SD15	Landscape and Visual Impact Assessment	Tyler Grange		23 <sup>rd</sup> December 2021
SD16	Flood Risk Assessment	BWB		20 <sup>th</sup> December 2021
SD17	Ecological Impact Assessment	RammSanderson		December 2021
SD18	BIA Metric 3.0			
SD19	BIA Baseline Habitats Plan	RammSanderson		15 <sup>th</sup> December 2021
SD20	BIA Proposed Habitats Visualisation Plan	RammSanderson		15 <sup>th</sup> December 2021
SD21	Preliminary Arboricultural Impact Assessment	Tyler Grange		23 <sup>rd</sup> December 2021

SD22	Heritage Impact Assessment	RPS		December 2021
SD23	Desktop Archaeology	RPS		17 <sup>th</sup> December 2021
SD24	Geophysical Survey Report	Magnitude Surveys		November 2021
SD25	Phase 1 Land Contamination	BWB		August 2021
SD26	Agricultural Land Quality	Soil Environmental Services Ltd		December 2021
SD27	Air Quality Assessment	BWB		December 2021

**OS Parcel 1570 Adjoining And West Of Chilgrove Drive And Adjoining  
And North Of, Camp Road, Heyford Park.**

LPA Application Reference: 21/04289/OUT

Reference No.	Document Title	Prepared By	Document Reference	Date
<b>Additional/Updated Plans and Documents Submitted During Determination</b>				
<i>Submission on 1<sup>st</sup> April 2022</i>				
AD01	Sustainable Drainage Strategy	BWB		January 2022
AD02	Utilities Assessment	BWB		March 2022
AD03	Planning Statement	Walsingham Planning		March 2022
AD04	Noise Impact Assessment	BWB		March 2022
AD05	Environmental Statement	Wardell Armstrong		March 2022
AD06	Environmental Statement Appendices	Wardell Armstrong		March 2022
AD07	Environmental Statement Non-Technical Summary	Wardell Armstrong		March 2022
AD08	Updated Covering Letter	Walsingham Planning		1 <sup>st</sup> April 2022
<i>Submission on 8<sup>th</sup> July 2022</i>				
AD09	LLFA Further Consultation Response	BWB		7 <sup>th</sup> July 2022
<i>Submission on 15<sup>th</sup> July 2022</i>				
AD10	Archaeological Evaluation Report	Oxford Archaeology		June 2022
AD11	Design and Access Statement Addendum	Edge Urban Design		July 2022
AD12	Access and Movement Parameter Plan	Edge Urban Design	P02 Rev A	6 <sup>th</sup> July 2022
AD13	Landscape and Open Space Parameter Plan	Edge Urban Design	P05 Rev A	6 <sup>th</sup> July 2022
AD14	Illustrative Masterplan	Edge Urban Design	P06 Rev A	6 <sup>th</sup> July 2022
AD15	Illustrative Masterplan (without annotations)	Edge Urban Design	P06 Rev A	6 <sup>th</sup> July 2022
<i>Submission on 19<sup>th</sup> July 2022</i>				
AD16	Technical Note 1 (Highways)	Hub Transport Planning		19 <sup>th</sup> July 2022