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2017 05 30

Dear Sir or Madam

**Applications: 17/0663/, 17/973/REM, 17/0895/F and 15/01357/F**

The determination of all these applications (and any others yet to be determined; 16/2296/H, 16/02348/F and 15/1209/REM?) depends, in the first instance, as to whether the proposals accord with the development plan. In this case the principal policy for the purposes of applying s38(6) is policy V5 in the adopted Cherwell Local Plan. The Council has previously adopted two comprehensive development briefs and aborted an attempt to adopt a development framework. The Head of Development Management says (email 20 January 2017), “In terms of the Lasting Arrangement, Policy Villages 5 of the adopted Local Plan is now the starting point for the considering of future development proposals.  Policy Village 5 identifies that the redevelopment of the site forms a comprehensive integrated approach to development.  The Council will need to be satisfied that future development proposals comply with Policy Villages 5.  Clearly, this is a matter you may also wish to raise as part of your future representations.”. Clearly a master plan, development brief or development framework is required to secure a **comprehensive integrated approach.**

Deciding applications in accordance with this requirement of policy V5 is being made impossible while the Council remains intent on taking a piecemeal approach to the development of the site. Although the legislation allows for ‘other material considerations’ to override development plan policy, there is a clear intention within both law and policy to operate a ‘plan led system’. The concern of the Secretary of State about the lack of adopted development plans across the country would not sit very comfortably with the officers’ assessment that adopted policies can be so easily overridden and without proper or any explanation. In the case of Upper Heyford the Council has consistently sought to control development through comprehensive planning briefs and latterly, the development framework, the withdrawal of which occurred with no explanation. Indeed a master plan was referred to in recent correspondence (and by an agent for a current application 15/01357/F). No explanation has ever been provided either to us or to the Council committee(s) as to why policy V5 and the requirement that, “a comprehensive integrated approach will be expected.” should not continue to apply.

The reference (Mr Lewis email of 1 March 2017) to the Council taking the comments of Historic England and Design and Conservation’ into account rings hollow despite policy V5 stating that the views of “…Historic England will be required in formulating specific development proposals for the site.” Having seen minutes of meetings including Historic England and the Council’s conservation officers it is clear that their views are being ignored. The Council approved the heritage centre on the officers’ recommendation without the taking of expert advice as recommended by Historic England who have also confirmed that a holistic approach should be taken in the light of the international significance of the site. Whatever the officers might think about the appropriateness of World Heritage Site status, there are **3 international conventions and a Culture White Paper** which should be applied to the development proposals being made on this site.

Unpacking policy V5 it can be seen that there are any number of references and requirements which individually and/or together clearly explain the reasons why a ‘**comprehensive integrated approach**’ is necessary, and why proposals considered in the absence of a comprehensive plan could not reasonably comply with this development plan policy.

- Proposals need to demonstrate how they would, …“enable environmental improvements and the heritage interest of the site as a military base with Cold War associations to be conserved,”

- if, 1,500 jobs are to be created, many of these could be associated with the tourism and heritage aspects of the site once these have been properly investigated,

- if a hotel, is thought appropriate then, again, the Heritage Impact Assessment (see below) must be carried out,

- heritage and tourism have particular characteristics in terms of “Access and Movement” that would need to be explored as part of the ‘comprehensive integrated approach’,

- “Proposals must demonstrate that the conservation of heritage resources, landscape, restoration, enhancement of biodiversity and other environmental improvements will be achieved across the whole of the site … In order to avoid development on the most historically significant and sensitive parts of the site,” .This can only be demonstrated through a comprehensive plan.

- “The areas proposed for development adjacent to the flying field will need special consideration to respect the historic significance and character of the taxiway and entrance to the flying field, with development being kept back from the northern edge of the indicative development areas. The release of greenfield land within the allocated site Policy Villages 5 will not be allowed to compromise the necessary environmental improvements and conservation of heritage interest of the wider site.” Again a comprehensive plan would be necessary to establish that these principles being respected.

- “The reinstatement of the historic Portway route across the western end of the extended former main runway as a public right of way on its original alignment”. This incursion into the flying field will need to be treated with great sensitivity in accordance with a plan showing land uses and public access.

- “A Travel Plan should accompany any development proposals”. Heritage and tourism could make up a substantial part of the overall traffic and must be taken into account through the preparation of such a Plan.

- a comprehensive plan is necessary to demonstrate, “The preservation of the stark functional character and appearance of the flying field beyond the settlement area, including the retention of buildings of national interest which contribute to the area’s character.” (actually of international interest).

- “The achievement of environmental improvements within the site and of views to it including the removal of buildings and structures that do not

make a positive contribution to the special character or which are justified on the grounds of adverse visual impact, including in proximity to the proposed settlement, together with limited appropriate landscape mitigation, and reopening of historic routes.” The conservation officers are concerned that the site should be considered as a whole and that most if not all features would have served some historic purpose which might justify their retention.

- The integration of, “ The conservation and enhancement of the ecological interest of the flying field through appropriate management and submission of an Ecological Mitigation and Management Plan…”, will require integration with the heritage management plan.

 - The requirement that, “Visitor access, [is] controlled where necessary, to (and providing for interpretation of) the historic and ecological assets of the site, “ is a matter that can only be properly provided for with a ‘comprehensive integrated approach’.

- A heritage impact assessment (see below) is necessary to understand how tourism could contribute to the, “Provision of a range of high quality employment opportunities…”,

- A comprehensive approach is necessary to understand how, “ New and retained employment buildings should make a positive contribution to the character and appearance of the area and should be located and laid out to integrate into the structure of the settlement.”

- a master plan must be required if, “A full arboricultural survey should be undertaken **to inform the masterplan** (emphasis added).

- Although the policy states that, “New development should reflect high quality design that responds to the established character of the distinct character areas where this would preserve or enhance the appearance of the Former RAF Upper Heyford Conservation Area.”, the conservation officers and Historic England are now both seeking to adopt a more holistic approach supporting the need for a comprehensive plan.

- The planning officers have been working on the premise that, “There is no specific obligation in Policy Villages 5 to require any heritage feasibility work,”(Mr Lewis email 1 March 2017). That could not be further from the truth as policy V5 states that, “Management of the flying field should preserve the Cold War character of this part of the site, and allow for public access. New built developmenton the flying field will be resisted to preserve the character of the areaLandscape/Visual and **Heritage Impact Assessments** **should be undertaken as part of development proposals and inform the design principles for the site**. Proposals should demonstrate an overall management approach for the **whole site**. (emphasis added)” None of these requirements can be met without a comprehensive plan of uses, management principles, financial contributions and public access.

- Unfortunately, “Proposals … for a heritage centre given the historic interest and Cold War associations of the site,” have been approved without any heritage assessment, contrary to the advice of Historic England and this development plan policy. There should be no surprise if this turns out to be the wrong building in the wrong place - even before it is finished.

In summary, a comprehensive integrated approach is absolutely necessary in light of the need to coordinate the following matters:-

* Coordinating development of land in different ownerships,
* reviewing housing densities and locations in the light of the increased allocations,
* complying with international conventions regarding heritage and culture,
* enabling a holistic approach to the preservation or enhancement of the character or appearance of the conservation area,
* managing the implications for tourism on the site and in the area,
* assessing employment potential, to which heritage and tourism could make a significant contribution,
* assessing the location of commercial uses, including warehousing and car storage,
* addressing the interface of the heritage site with adjoining uses/development in terms of both buildings and movement,
* assessing transport and travel to and around the whole site,
* managing public access across the site (ie including QRA and Northern Bomb Stores), fencing and the restoration of public rights of way,
* protection of biodiversity across the site,
* securing financial contributions to enable the conservation of the Cold War heritage.

In short, most of the requirements set out in the development plan policy V5 rely on the preparation of a master plan and the need for a comprehensive integrated approach. It is hard to imagine any circumstances in which this specific requirement of the principal development plan policy should or could be overridden. The current owners have had nearly 7 years to have produced and/or the Council to have insisted and consulted on this necessary information/evidence.

Now that Dorchester Group is belatedly in the process of assessing the heritage and tourism potential the Council should be explaining that this is only part of what is required by policy V5. Without taking a ‘comprehensive integrated approach’ no applications can accord with the development plan and must be refused without overriding reasons for its absence.

The piecemeal approach so far taken by the Council to the development of this site of international historic/heritage significance is contrary to both law and policy and is likely to fail to prevent further inappropriate developments. The current applications refer to the ‘dilution of the historical interest’. The 10,000 signature petition relating the demolition of the water tower described the ‘destruction of history’, and the Council should be using their powers to prevent further cultural cleansing of the best preserved Cold War remains in the country.

Yours sincerely

Daniel Scharf

Copy Scott Barnes, Rose Todd (CDC)

 David Brock, Chris Welch, Martin Small (HE)