

PLACE AND GROWTH INTERNAL MEMORANDUM

From: Planning Policy and Growth Strategy

To: Development Management (FAO Andrew Lewis)

Our Ref: Application Response **Your Ref:** 18/00825/HYBRID

Ask for: Lewis Bankes-Hughes **Ext:** 1884 **Date:** 30 July 2018

APPLICATION FOR PLANNING PERMISSION PLANNING POLICY CONSULTATION RESPONSE

This response raises the key planning policy issues only.
All material planning policies and associated considerations will need to be taken into account.

Planning Application No.	18/00825/HYBRID
Address / Location	Heyford Park Camp Road Upper Heyford Bicester OX25 5HD
Proposal	Demolition of buildings and structures as listed in Schedule 1; Outline planning permission for up to 1,175 new dwellings (Class C3); 60 close care dwellings (Class C2/C3); 929 m2 of retail (Class A1); 670 m2 comprising a new medical centre (Class D1); 35,175 m2 of new employment buildings, (comprising up to 6,330 m2 Class B1a, 13,635 m2 B1b/c, 9,250 m2 Class B2, and 5,960 m2 B8); 2.4 ha site for a new school (Class D1); 925 m2 of community use buildings (Class D2); and 515 m2 of indoor sports, if provided on-site (Class D2); 30m in height observation tower with zip-wire with ancillary visitor facilities of up to 100 m2 (Class D1/A1/A3); 1,000 m2 energy facility/infrastructure with a stack height of up to 24m (sui generis); 2,520 m2 additional education facilities (buildings and associated external infrastructure) at Buildings 73, 74 and 583 for education use (Class D1); creation of areas of Open Space, Sports Facilities, Public Park and other green infrastructure; Change of Use of the following buildings and areas: Buildings 357 and 370 for office use (Class B1a); Buildings 3036, 3037, 3038, 3039, 3040, 3041, and 3042 for employment use (Class B1b/c, B2, B8); Buildings 217, 3102, 3136, 3052, 3053, 3054, and 3055 for employment use (Class B8); Buildings 2010, 3008, and 3009 for filming and heritage activities (Sui Generis/Class D1); Buildings 2004, 2005 and 2006 for education use (Class D1); Buildings 366, 391, 1368, 1443, 2007, 2008 and 2009 (Class D1/D2 with ancillary A1-A5 use); Building 340 (Class D1, D2, A3); 20.3ha of hardstanding for car processing (Sui Generis); and 76.6ha for filming activities (Sui Generis); the continuation of use of areas, buildings and structures already benefiting from previous planning permissions, as specified in Schedule 2; associated infrastructure works including surface

	water attenuation provision and upgrading Chilgrove Drive and the junction with Camp Road
Key Policies / Guidance	<p><u>Cherwell Local Plan 2011-2031 Part 1</u></p> <p>Policy PSD1: Presumption in Favour of Sustainable Development - p36 Policy SLE 1: Employment Development - p45 Policy SLE 3: Supporting Tourism Growth - p52 Policy SLE 4: Improved Transport and Connections - p55 Policy BSC 1: District Wide Housing Distribution - p61 Policy BSC 2: The Effective and Efficient Use of Land - Brownfield land and Housing Density - p62 Policy BSC 3: Affordable Housing - p64 Policy BSC 4: Housing Mix - p67 Policy BSC 7: Meeting Education Needs - p71 Policy BSC 8: Securing Health and Well-Being - p72 Policy BSC 9: Public Services and Utilities - p74 Policy BSC 10: Open Space, Outdoor Sport and Recreation Provision - p75 Policy BSC 11: Local Standards of Provision - Outdoor Recreation - p80 Policy BSC12: Indoor Sport, Recreation and Community Facilities - p82 Policy ESD 1: Mitigating and Adapting to Climate Change - p85 Policy ESD 2: Energy Hierarchy and Allowable Solutions - p87 Policy ESD 3: Sustainable Construction - p88 Policy ESD 4: Decentralised Energy Systems - p91 Policy ESD 5: Renewable Energy - p93 Policy ESD 6: Sustainable Flood Risk Management - p95 Policy ESD 7: Sustainable Drainage Systems (SuDS) - p98 Policy ESD 8: Water Resources - p100 Policy ESD 10: Protection and Enhancement of Biodiversity and the Natural Environment - p106 Policy ESD 11: Conservation Target Areas - p108 Policy ESD 13: Local Landscape Protection and Enhancement - p111 Policy ESD 14: Oxford Green Belt - p114 Policy ESD 15: The Character of the Built and Historic Environment - p117 Policy ESD 17: Green Infrastructure - p124 Policy Villages 5: Former RAF Upper Heyford - p254 Policy INF 1: Infrastructure - p261</p> <p><u>Cherwell Local Plan 1996 (Saved Policies)</u></p> <p>Policy S29: Loss of existing village services Policy TR1: Transportation funding Policy TR7: Development attracting traffic on minor roads Policy C18: Development proposals affecting a listed building Policy C21: Proposals for re-use of a listed building Policy C23: Retention of features contributing to character or appearance of a conservation area Policy C25: Development affecting the site or setting of a schedule ancient monument Policy C28: Layout, design and external appearance of new development Policy C30: Design Control Policy C31: Compatibility of proposals in residential areas Policy ENV12: Development on contaminated land</p>

<p>Key Policy Observations</p>	<p>Principle of development</p> <p>Former RAF Upper Heyford is allocated as a development site in the Cherwell Local Plan (Policy Villages 5).</p> <p>Policy Villages 5 states that any new development should be focussed to the south of the flying field, on limited greenfield land to the south of Camp Road and on an area to the east of Larsen Road.</p> <p>Areas with the potential for development are shown on the inset policy plan accompanying Policy Villages 5.</p> <p>The majority of development proposed by the masterplan is located within these potential development areas but there are a number of key exceptions including residential development on Parcels 21 and 23, a sports park on Parcel 18 (which is also outside the Policy Villages 5 allocation) and commercial development on part of Parcel 22.</p> <p>These additional sites are not therefore considered to comply with Policy Villages 5 and justification will need to be considered having regard to the harm which would potentially arise, particularly to acknowledged heritage and environmental interests.</p> <p>It should however be noted that the development as proposed would make a significant contribution towards the council's strategic housing requirement identified in Policy Villages 5 and would enable the council to continue to maintain a five-year housing land supply. The development would also result in significant economic benefits and economic growth through employment development, tourism and the creation of high quality employment opportunities including skilled and creative jobs as part of the Creative City proposal.</p> <p>Residential</p> <p>Policy Villages 5 requires approximately 1,600 homes in addition to the 761 homes (net) already permitted. Prior to the submission of this application, a total of 821 dwellings have been permitted and 443 of those dwellings have already been completed, of which 314 were identified in the 2017 AMR. There is therefore a remaining requirement for 1,540 homes. This requirement would be met through the proposed masterplan which provides for 1,600 homes including 1,175 new dwellings in addition to 425 homes (not part of this application) relating to current applications or third party land and 60 close care (C2/C3) units proposed.</p> <p>The general distribution of housing on the site is considered acceptable, given its location to the south of the flying field and proximity to the proposed local centre, although there are significant concerns about how housing (470 dwellings) proposed to be developed on Parcel 23 would provide for a layout that would <i>'...enable a high degree of integration with development areas within the 'Policy Villages 5' allocation, with connectivity between new and existing communities'</i> (Local Plan, p.259, Bullet 3) and whether a satisfactory living environment would be achieved on this area in view of the proposals to develop a 'Creative City' on Parcel 22 , a 'Filming Area' on Parcel 27 East and 'Temporary Set Construction/Event Parking' in Parcel 24 which would isolate that residential area.</p>
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The impact on the Conservation Area caused by the partial loss of the southern bomb stores (Parcel 23) would also need detailed consideration and discussion with Design and Conservation.

Policy BSC 2 requires the effective and efficient use of land and requires a density of at least 30 dwellings per hectare (dph). The application documents state that residential development would be built to an average density of 35 dph, exceeding the Policy BSC2 requirement, with densities ranging from 13 dph to 40 dph. In view of the fact that development is proposed outside of the areas identified by the Local Plan, a detailed examination of the proposed densities will be required to ensure 1) that this would not happen unnecessarily and 2) to weigh the efficiency of land use in the overall balance of considerations where there is likely to be conservation or environmental impact. It is important to understand whether there are any opportunities within the Local Plan's identified development area that might obviate the need to develop land in other parts of the Conservation Area where adverse impact might arise or where development not fully achieve the objectives of Policy Villages 5. It is noted that the operation of the sewage works restricts in part the potential for the residential development previously allocated within Parcel 17.

Policy Villages 5 requires at least 30% affordable housing. The application documents state that at least 30% of the total number of dwellings would be affordable and would include affordable rented and shared ownership housing. Details of the precise tenure arrangements and mix of affordable and market housing need to be agreed. The opportunity to provide self-build affordable housing required by Policy Villages 5 is encouraged and should be explored further.

Policy Villages 5 requires the provision of extra care housing. Policy BSC4 requires housing sites of at least 400 dwellings to provide a minimum of 45 self-contained extra care dwellings. The proposed masterplan contains provision for 60 close care units (Parcel 19). Limited information has been provided in relation to these units and it is unclear whether they will comprise a C2 or C3 use but Policy BSC4 requires 'self-contained extra care dwellings'.

Policy BSC4 requires new development to provide a mix of homes to meet current and expected future requirements in the interests of meeting housing need and creating socially mixed and inclusive communities. The proposed masterplan focuses solely on affordable housing rather than the mix of affordable and market housing. Further details of the proposed market housing mix are therefore required. The proposed affordable housing mix appears weighted towards 2 and 3 bed dwellings although the proportion of 1 bed affordable dwellings may need to be increased to meet SHMA requirements. Further advice should be sought from the affordable housing team in relation to local housing requirements.

Commercial

Policy Villages 5 requires the provision of approximately 120,000 sqm of B1, B2 and B8 employment land and the creation of 1,500 jobs.

The proposed masterplan proposes 35,175 sqm of new build employment

development comprising 6,330 sqm (B1a), 13,635 sqm (B1b/c), 9,250 sqm (B2) and 5,960 sqm (B8), in addition to the conversion of a number of existing buildings throughout the site. The main quantum of development is located at Parcel 22 (Creative City) where 13.5ha (gross) or 10.7ha (net) of employment development is proposed, primarily through the reuse of 7 hardened aircraft shelters.

Although appropriate re-use of the hardened aircraft shelters is encouraged, the heritage impact of the scheme as proposed will require detailed consideration. The proposal for Creative City shows the retention of the hardened aircraft shelters and existing hardstanding. However, the proposed additions have the potential to cause substantial harm to the character, appearance and layout of these buildings. Heritage advice is required and should be sought in the first instance from Design and Conservation. Changes to the design, scale and massing of the indicative development could significantly affect the quantity of employment floor space provided by the development and the ability to meet policy requirements. A clear understanding of the proposals for Creative City is therefore required.

The proposed masterplan suggests that it will be possible to create at least 1,500 jobs on site through the various employment uses. This would comply with Policy Villages 5.

Heritage

Policy Villages 5 requires the heritage interest of the site as a military base with Cold War associations to be conserved. The site is designated as a Conservation Area and there are a number of scheduled ancient monuments, listed and locally listed buildings distributed throughout the site.

A number of potential heritage issues have already been raised in relation to the proposed residential and commercial uses in relation to the southern bomb stores and hardened aircraft shelters.

The masterplan also proposes the demolition of a number of buildings. This includes the demolition of buildings 315 and 151 to facilitate the provision of a mixed use development and close care facility. These buildings are considered to make a significant contribution to the former character of the airbase. The retention and reuse of these buildings should therefore be explored. Detailed consultation with Historic England and Design and Conservation is advised, especially given the proximity of buildings 315, 316 and 318 to building 126, a scheduled ancient monument.

Policy Villages 5 requires proposals to demonstrate the conservation of heritage resources across the site; the provision of visitor access, controlled where necessary, to (and providing for the interpretation of) the historic assets of the site; the management of the flying field to preserve the Cold War character of the site, allowing for public access; and the provision of a heritage centre given the historic interest and Cold War associations of the site.

Although it is acknowledged that a number of organised tours have taken place over previous years and that a heritage centre has been

provided (although not yet fully operational), the overall approach towards managed conservation of the site to date, including the restoration and reuse of historic buildings, as well as public access to the flying field and provision of interpretation information, has been poor. There is therefore an opportunity for this application to be used as a catalyst to significantly improve the historic profile of, and access to, the site. The proposals made by the applicant, including the provision of a heritage trail and Flying Field Park are welcomed although these elements of the proposed masterplan should be implemented early on in the development programme to benefit existing residents as well as those with an interest in the Cold War associations of the site. The applicant should be encouraged to take a comprehensive heritage-led approach to development across the site.

There is no objection to the proposed filming areas on the flying field from a heritage perspective providing the potential impacts on heritage assets, landscape and living conditions of residents are taken into consideration and appropriately controlled where necessary.

Tourism

The proposed masterplan proposes a visitor destination area, located to the south of the Flying Field Park. This area will include a heritage centre, exhibition space, activity zones and an observation tower with zip wire. These attractions are considered to comply with Policy SLE3, which supports tourism development, and Policy Villages 5 which aims to provide for visitor access to the flying field and the provision of a heritage centre.

There is however a concern about the design, appearance, illumination and position of the proposed observation tower and zip wire in relation to the existing landing strip – specifically the distance between the tower and the landing strip. It is therefore recommended that the tower is relocated further south of the landing strip to reflect the historic function and character of the air base. The wider landscape impact of the proposed observation tower also needs to be considered, especially views across the Cherwell valley and from Rousham, Lower Heyford, Upper Heyford and Oxford Canal Conservation Areas.

The Control Tower Park and Flying Field Park should be carefully designed and landscaped to ensure that they contribute towards and preserve the Cold War character and appearance of the flying field. Further advice on the design of these areas should be sought from Design and Conservation and Landscape Services.

Connectivity

Policy Villages 5 requires the layout of the site to enable a high degree of integration with the development areas with connectivity between new and existing communities. The proposed masterplan generally provides a good level of connectivity throughout the site including pedestrian and cycle routes. However, the connectivity between Parcel 23 and the rest of the site is poor and is further compounded by the routeing of the proposed HGV access which further intersects Parcel 23 from the rest of the site.

The level of green infrastructure proposed (aside from formal open space)

is relatively low and the key routes throughout the site could be enhanced to become green corridors, providing biodiversity links between the various parcels and connecting proposed areas of public open space and the countryside.

The reinstatement of Portway and Aves ditch are welcomed as are the connections between the site and wider countryside.

Policy Villages 5 requires the management of the flying field to allow for public access. Although the proposed masterplan references heritage tours and includes the provision of the Flying Field Park, these are not considered to provide a sufficient level of access to the flying field and associated heritage. It is recommended that further options for providing public access to the flying field are explored.

Biodiversity

Policy Villages 5 requires a range of biodiversity and environmental improvements across the site and requires the submission of an Ecological Mitigation and Management Plan to conserve and enhance the ecological interests of the flying field. Wildlife corridors are to be enhanced, restored or created and provision should be made for habitat for great crested newts and ground nesting birds. A net gain in biodiversity will be sought. Development should also protect and enhance the Local Wildlife Site (including the new extension to the south) and visitor access should be provided, controlled where necessary, to allow for the interpretation of ecological assets. Policy ESD10 should also be taken into consideration.

The proposed masterplan proposes development on several ecologically sensitive areas across the site, which has the potential to impact the Local Wildlife Site and calcareous grassland. Specific areas of concern include the proposed filming area in Parcel 27 and the residential development within Parcel 23. The Planning Statement and accompanying Environmental Statement outline a range of measures intended to meet the requirements of Policy Villages 5 and Policy ESD10 with the aim of achieving a net gain in biodiversity. The proposed mitigation measures require detailed consideration and advice should be sought from relevant consultees, including the council's Ecologist. It is noted that an Ecological Mitigation and Management Plan, a key policy requirement, has not been submitted with this application. This should be requested once an overall approach has been agreed.

Transport

Policy Villages 5 requires measures to minimise the impact of traffic generated by the development, including the M40, rural road network and Middleton Stoney. It is understood that extensive negotiations are taking place between Dorchester Group, Highways England and Oxford County Council in order to identify a suitable package of mitigation measures.

Securing appropriate transport infrastructure and mitigation is central to delivering a sustainable settlement and the clear advice of both Oxfordshire County Council and Highways England should be sought.

Recreation

The proposed masterplan proposes 7.69ha of general green space, 2.19ha of play space, 3.17ha of outdoor sports and 1.03 ha of allotments, in addition to a 20.3ha Flying Field Park and 4.1ha Control Tower Park. The proposed masterplan is therefore considered to comply with the requirements relating to the provision of open space subject to comments from Recreation and Landscaping teams.

Conclusion

The application as submitted is considered to represent a comprehensive approach to the redevelopment of former RAF Upper Heyford and is considered to generally accord with the objectives of the local plan in terms of strategic housing and employment needs while securing the delivery of a lasting arrangement on this exceptional large scale brownfield site (Local Plan, p.256, Para C291).

There are however a number of key policy considerations (presented as a series of questions/discussion points), which need to be taken into account in the determination of this application. These include:

1. Is it necessary to release additional land outside the areas identified for potential development, especially with regard to the potential for increasing density within other residential parcels? Have the potential impacts arising from the release of these areas been fully addressed?
2. Does Parcel 23 provide an appropriate level of integration and connectivity as required by Policy Villages 5 and would a satisfactory living environment be achieved?
3. Has the heritage impact of the Creative City scheme on the hardened aircraft shelters been fully identified? Further detailed discussion with Design and Conservation is required.
4. Do the proposed heritage and tourism proposals meet Policy Villages 5 requirements or are there further opportunities to conserve, restore and reuse buildings, enhance visitor access to the Flying Field and promote the Cold War character and historic interest of the site? Is the proposed observation tower and zip wire appropriate or would it result in adverse harm to the landscape and historic character of the air base? Has the development proposal been informed by a comprehensive, heritage-led approach been undertaken? Further detailed discussion with Design and Conservation and Historic England is required.
5. Has sufficient green infrastructure been provided and has the potential to enhance key routes and link existing and proposed green areas been fully explored?
6. Have the biodiversity impacts of the proposed development, especially on the Local Wildlife Site been fully assessed and are the mitigation measures appropriate? When will the Ecological Mitigation and Management Plan be produced and will it provide a comprehensive and long-lasting approach? Further detailed discussion with relevant consultees, including the council's Ecologist is required.

	<p>7. As and when the transport mitigation measures are identified, will these contribution to the delivery of a sustainable settlement? Further detailed discussion between the applicant, Oxfordshire County Council and Highways England is required.</p>
Policy Recommendation	Support for the delivery of the new settlement subject to the satisfactory resolution of the issues identified above.