

P16-0613 IH/PB

12th December 2017

Andrew Lewis
Principal Planning Officer (Major Developments)
Development Management
Cherwell District Council
Bodicote House,
Bodicote,
Banbury,
Oxfordshire,
OX15 4AA

Dear Andrew,

RAF Heyford Masterplan – unofficial scoping opinion

On the 4th September 2017, Pegasus Planning Group, who are acting as agents for Dorchester Group on the RAF Heyford site, submitted via email, to you, a request for an unofficial scoping opinion that focused on the topic of cumulative impact. We requested that such an opinion was unofficial and focused on this one area due to the considerable and still on going, pre-submission consultation that is being undertaken with the statutory consultees. This pre-submission consultation has offered all parties the opportunity to consider the possible implications of this masterplan development as it has continued to evolve and has helped to shape the environmental assessments and their methodologies within the Environmental Statement.

Through this ongoing pre-submission consultation, of which officers at Cherwell District Council (CDC) have been part, you were aware that Dorchester Group were keen to submit the application for the Masterplan to CDC in early 2018. As agents, we had therefore asked for a very quick turnaround of the un-official Scoping Opinion from CDC so that the necessary environmental assessments could remain on track.

Under the Town and County Planning (Environmental Impact Assessment) Regulations 2017, Reg 15 (4), an authority must issue a Scoping Response within 5 weeks of its receipt and if longer period is required this must be agreed in writing with the person who made the request, i.e. Pegasus Planning as the agent for this application. Despite two emails, 25/9/17 and 04/10/17, to CDC chasing a response to the Scoping Opinion, none was received, neither was any request for an extension to the time frame required for issuing one. It was not until 11 weeks after the Request was first made that an email was received from CDC responding to the un-official Scoping Request. This email was written by Lewis Banks-Hughes, who is the Planning Research and Monitoring Officer at CDC and was sent on the 14th November 2017.

Within this email response, Mr Banks-Hughes requests that in addition to the eight sites already being considered within the ES for their cumulative impact, a further two sites are considered. These two sites are allocated sites within Cherwell District Council's adopted Local Plan and are Bicester 8 (Former RAF Bicester) and Bicester 11 (North East

Bicester). The grounds given for the inclusion of these two sites as cumulative sites are their possible implications on *"tourism, heritage, leisure, recreation, employment and the local community."* No greater detail on the possible implications is given.

The request for these two sites to be included within the cumulative assessment has been considered by Pegasus Planning Group and we query the need for these two additional schemes to be assessed. Our reasoning is outlined below, and we request that CDC consider these queries and respond with detailed reasoning on the need to include them if that indeed remains the Council's position.

Bicester 8 (Former RAF Bicester)

Policy Bicester 8 from the adopted Local Plan (LP) states that it will *"encourage conservation-led proposals to secure the long-lasting, economically viable future for the former RAF Bicester technical site and flying field. It will support heritage tourism uses, leisure, recreation, employment and community uses."*

To date the only application was a Screening Request in 2005 for a residential re-development scheme for a minimum of 975 dwellings and school. Given the passage of over a decade and the subsequent adoption of the Local Plan in 2015, this scheme has not been progressed and is now unlikely to be, because residential is not included within the allocation of Bicester 8.

As there is no other scheme in the public domain, either at consultation or within the planning system, for any development on this site, we question what possible environmental impacts can be assessed within the Environmental Statement for development on this land. The Policy Bicester 8 offers no specific capacity or quantum for any development e.g. number of tourists or users of leisure facilities, or square footage of employment space that may be built on this site.

Pre-submission consultation with Oxford County Council (OCC) has not led to them asking for its inclusion due to cumulative concerns of how any development on this land would interact with the Masterplan development at Upper Heyford, nor have Historic England requested that it be considered from a heritage perspective.

Bicester 11 (North East Bicester)

Policy Bicester 11 is for employment land at North East Bicester and the Local Plan states that it will create approximately 1,000 jobs. Within the "Key site-specific design and place shaping principles" there is no mention of the possibility of interactions with RAF Upper Heyford, which sits over 7km away to the west. From a heritage perspective consideration over the implications with RAF Bicester Conservation Area are mentioned, and Historic England and CDC's own heritage team have raised no cumulative heritage concerns. There is also no mention of the need for tourism, leisure or recreation (bar the need for new footpaths and an integrated design with neighbouring sites) in the Key Design Principles of the site set out in the Local Plan.

As you will be aware, considerable pre-submission consultation and joint-working has taken place with OCC and their transport team and they have requested that several other Bicester allocations are considered within the cumulative assessment to ensure that the road network can cope and mitigation is designed where there are pinch points.



All the cumulative sites OCC that have asked to be included in the Environmental Statement have been included.

Pegasus Planning Group do not believe that the exclusion of Bicester 11 from OCC's requests from cumulative transport modelling is an over-sight given this context of active dialogue and joint working which has been taking place over several years now. Development at Bicester 11 was granted outline planning in May 2016 (15/01012/OUT) and reserved matters applications for two phases are currently being consulted upon after being submitted in October 2017 (17/01289/REM). Therefore, if OCC had concerns that the cumulative traffic caused by this development and the masterplan at Upper Heyford they would have requested it much earlier. We therefore question what the possible cumulative impact from tourism, heritage, recreation, employment and local community could reasonably be assessed as part of the Environmental Statement for the masterplan development at RAF Upper Heyford.

Due to the advanced nature of the draft Environmental Statement, we request that the Major Project team within the Planning Department at CDC re-consider this ES scoping request and the inclusion of these two additional cumulative schemes. If after re-considering, there is a robust case for these two schemes to be considered cumulatively, we request that more detailed information is provided on the reasoning behind this request, so as to ensure that the cumulative assessment is comprehensive and there will be no requirement for a Regulation 25 later to enable consideration and determination of this application in this regard.

To keep the submission of this planning application on target for early 2018, we request that CDC give their urgent attention to whether these two sites should be included within a cumulative assessment, by the 19th December 2017. If no comment is forthcoming from CDC or a revised date is not agreed, we will proceed on the current basis that these two additional Bicester sites are not warranted to be included in the cumulative assessment, for the reasons rehearsed above.

We look forward to hearing from you on this matter,

Yours sincerely,

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