

10th October 2025

Heyford Park application 25/02190/HYBRID

Mid-Cherwell Neighbourhood Plan Forum wishes to OBJECT to this application for the following reasons:

1. **Local Plan policy:** The Cherwell Local Plan 2042, recently submitted to Government for examination, contains a clear policy that proposes restricting development at Heyford Park to the numbers of homes already approved in the previous Local Plan 2031 (Policy Villages 5). Until such time as this revised Local Plan is adopted, Policy Villages 5 remains the current policy for Heyford Park. Cherwell District Council must therefore refuse permission for this application, a massive increase in the scale of development from that originally envisaged and supported, which is contrary to policy.
2. **Neighbourhood Plan:** The MCNP, which became part of the Development Plan in 2019, remains in force. A revised neighbourhood plan is currently in preparation, which excludes Heyford Park. However, until such time as the revised plan is adopted, the policies referred to below are still current, and must be taken into account in determining this application.
3. **Loss of greenfield land:** We oppose the extension of the boundary of Heyford Park southwards towards Caulcott on to green fields. This additional land is intended in the masterplan to be home to about 790 new dwellings. This loss of greenfield land and open countryside is unnecessary, damaging to the local environment, reduces farming land essential to self-sufficiency, and damages wildlife and biodiversity. It is also non-compliant with Local Plan policy ESD10, ESD13 and other current Local Plan policies.
4. **Coalescence:** The proposed development will encroach on several of the surrounding settlements – particularly Caulcott, Upper Heyford, Somerton, Fritwell, Ardley with Fewcott, and Middleton Stoney. This will threaten either actual or perceived coalescence, damaging the separate identity of the existing historic settlements and their communities. MCNP policy PD3 refers specifically to Upper Heyford village, which is endangered by encroachment from parcel 54 of the proposed development. It also refers to potential coalescence with other surrounding settlements. Caulcott is particularly threatened in this regard due to the southward extension of Heyford Park proposed in the scheme. The emerging MCNP2042 includes Local Gap policy MC10 which further seeks to prevent coalescence.
5. **Location:** Development on this greatly-increased scale is unsuited to the rural landscape with its historic agricultural settlements. It is not only out of character, but is located within a network of narrow country lanes that were never meant to carry the volumes and types of traffic that are inevitable. Heyford Park is very close to the fast-expanding town of Bicester, where much more suitable roads can cope with the increased population. It is opportunism rather than good planning that drives the proposed location for such large-scale growth in the wrong place.
6. **Conservation Area:** The RAF Upper Heyford Conservation Area was designated in 2006. The applicants' own Heritage Impact Statement says (para 7.2) that the various heritage elements of the site "form a coherent ensemble that is a physical manifestation of the concept of Cold War airborne deterrence and

contributes to the holistic nature of the CA and the austere character and appearance of the late-20th century military landscape.” This ‘austere character and appearance’ is key to the purpose of the Conservation Area designation. The applicants’ proposal to superimpose upon this character that of an entirely alien form – an Italian hill town – must be recognised as totally undermining the intent of the CA. Although the Forum broadly supports use of parts of the historic Flying Field to help deliver modest amounts of additional housing and employment at Heyford Park, there are serious concerns that the proposed scheme causes damage to certain historic elements, but more importantly that overall the concept of protecting the austere Cold War character of the site is completely undermined by the proposals. Cherwell DC, the responsible body for upholding the concept of the CA, must reject the scheme for this reason, if for no others.

7. **Failure to consider alternatives:** The EIA Regulations (Schedule 4, paragraph 2) require for inclusion in an Environmental Statement: *“A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects”*.

The ES provided by the applicants deals with the question of alternatives at para. 4.4.8 to 4.4.15. However, the text simply explains that the proposed scheme has evolved over time, and refers the reader to the Design and Access Statement (which says nothing about alternatives that have been examined). In para 4.4.9 it is stated that: *‘In 2023 the Local Plan review highlighted the potential allocation of land to the south of the Site and identified Heyford Park as a ‘Local Service Centre’ with 1,125 dwellings proposed with the potential allocation of the greenfield land to the south of the Site. In 2024 with the new Government significant pressure has been applied to local authorities to deliver housing.’* This text is nothing more than a justification for the scheme that has been submitted for planning permission. The justification is however undermined by the fact the version of the Local Plan referred to was in fact then withdrawn and replaced with the current version which does NOT support any use of the greenfield land to the south of the Site.

The key point here is that the applicants have done nothing to include ‘a description of reasonable alternatives studied by the developer’, as required. For example, they could and should in our opinion have considered a scheme without the use of that greenfield land. There has been ample time following the withdrawal of the superseded policy to do so, and it is clearly perfectly reasonable to consider such an option. We consider that there has therefore been a clear failure to comply with the requirements of the EIA Regulations, and that Cherwell District Council should require full compliance before further consideration of the application. This should involve not only the suggestion we make above regarding omission of the greenfield land, but also consideration of alternative scenarios for layouts of Flying Field development, all of which we assume would be reasonable options. We note that the Regulations refer to ‘alternatives’ in the plural. The purpose of this Regulation is to allow decision-makers to judge whether another version of the scheme might be preferable, and to demonstrate that the applicant has thoroughly researched this. Instead we are presented with a *fait accompli*, which is therefore non-compliant.

8. **Traffic:** We are very concerned about the impact of any further development at Heyford Park on the road network surrounding the site. The impact of such a large increase in the population of Heyford Park on already stressed rural roads will be very harmful to the quality of life of residents of the surrounding villages, and damaging to their environment (air quality, noise, light pollution, etc), and to the natural environment.
9. **Cumulative Impact:** The cumulative traffic impact on the surrounding communities of Heyford Park, Baynards Green warehousing, the Ardley SRFI, and Puy du Fou, as well as other major schemes, would

be massive. Proposals for public transport to alleviate much of the traffic generated are simply not credible. The failure of the planning system to provide a strategy for dealing with such a concentration of development in one locality is a major issue. This is an exceptional situation, with so many large-scale proposals impacting on a single rural location, and it demands an exceptional approach to assessing that impact. We ask that Cherwell DC requests the Highway Authority to provide an overview on the cumulative traffic implications of the above-mentioned proposals.

10. **Views:** The development will damage views, particularly in the vicinity of the Cherwell Valley, identified as special in both the Local Plan and the MCNP (Policy PD4). Views across the valley from Middle Aston parish and from parts of Lower Heyford parish will be particularly affected. Certain tall structures proposed, including wind turbines, will also disrupt and damage views from other parishes. MCNP policy PD4 has a clear reference to the adverse impact of development on the sensitive skylines identified in Fig.8. The photomontages provided by the applicant fail to show the impact of tall structures proposed within the Flying Field on the eastern flank of the Cherwell Valley skyline. Table 4(c) refers to the plan of Viewpoints on p.90 of the Heritage and Character Assessment, which includes a viewpoint from Middle Aston across the valley. This is a highly sensitive and well-established view that will be significantly damaged by tall structures visible over the skyline. Emerging MCNP2042 includes policy MC12 which adds further important views, including MAV2 - a view across the valley from Middle Aston – which is not addressed in the photomontages. Reference is also made to the RAF Upper Heyford Conservation Area Appraisal, in which Fig.2 clearly shows that this skyline has high impact as a dominant visual element.
11. **Light:** Light pollution from the development is likely to be seen from all eleven of the surrounding parishes that form the MCNP. The development will very likely fail to comply with MCNP policy PD6 on this subject and in particular criterion c) relating to the wider countryside. Para. 5.2.61 of the applicants' ES states: *'Night-time effects are not assessed as the surrounding existing built form within Upper Heyford has already introduced significant light spill into the receiving landscape.'*
12. **Flooding:** There has already been serious flooding at Caulcott attributed to development at Heyford Park and run-off into Gallos Brook. The topography of the proposed scaled-up development on land above existing settlements around Heyford Park will exacerbate such events. The promoters of the scheme must provide evidence that storm water run-off can be effectively managed. Local Plan policy ESD6 is relevant here.
13. **Utilities:** There are serious concerns about the adequacy of supply of various utilities for development on this scale – in particular of water.
14. **Education:** There is concern that the provision of six new schools at Heyford Park will impact adversely on existing school rolls in some surrounding villages.
15. **Mitigation:** Should Cherwell District Council permit this development, conditions must be applied to ensure that previously promised infrastructure will be delivered according to legal agreements, including the proposed health centre, Chilgrove Drive access road, and mitigation measures in various villages. Virtually none of the promised community benefits has so far been delivered. There is therefore no confidence that future S.106 agreements would be delivered in a timely way; we would expect that the surrounding parishes will be consulted in detail on any new S.106 requirements so that we can attempt to ensure compliance.