

[REDACTED]

From: [REDACTED]@thegardenstrust.org>
Sent: 20 July 2026 08:46
To: OxfordshireSRFI
Subject: Oxfordshire Strategic Rail Freight Interchange
Attachments: 25.02190.HYBRID Upper Heyford.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: CO

[REDACTED]

Dear Sir/Madam,

Thank you for consulting The Gardens Trust on this project. We wish to re-iterate the comments made in a previous representation (please see attached), emphasising the need for more information relating to the potential impact on the Registered Park and Gardens impacted.

Many thanks

[REDACTED]



[REDACTED]
Conservation Officer

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Registered charity number: 1053446

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29th October 2025

For the attention of [REDACTED]



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Please reply to:
consult@thegardenstrust.org

Dear [REDACTED],

RE: 25/02190/HYBRID | A hybrid planning application consisting of: Demolition of 222 existing buildings and structures as listed in Schedule 1. Up to 9,000 new dwellings (Class C3) comprised of: Outline planning permission for up to 8,848 dwellings (Class C3) Change of Use of Buildings 320, 345, 350,172 for up to 152 dwellings (Class C3) Outline planning permission for up to: 4,610 sq.m of new light industrial buildings (Class B2) 2,600 sq.m of new warehouse buildings (Class B8) 5,500 sq.m of new hotel buildings (Class C1) 40,650 sq.m of new commercial, business and service buildings (Class E), comprising of retail, restaurant/cafe, indoor sport/recreation and fitness, medical/health services, creche/nursery, and office/research & development. Learning buildings (Class F1), comprising of four primary schools (1 x 2FE and 3 x 3FE) , 1 secondary school (1 x 9FE) and a Centre for Peace Studies (1,100 sq.m.) 1,770 sq.m of local community uses (Class F2), comprising of community centre and library buildings 1,000 sq.m of Public House/restaurant (sui generis) 7,500 sq.m for datacentre buildings (sui generis) Renewable energy generation with associated infrastructure, including 3 wind turbines, solar pv and battery energy storage systems Change of use of 98 existing buildings: Permanent change of use of buildings and structures as listed in Schedule 2 Associated infrastructure works, including surface water attenuation provision, improvements to foul drainage systems, highway and transport works, green and blue infrastructure provision | Heyford Park (Upper Heyford Airfield), Camp Road, Upper Heyford , OX25 5HD

The above application relates to the redevelopment of the former Royal Air Force station at Upper Heyford (the site), located to the northeast of Rousham, a Grade I registered park and garden (RRPG), within the RAF Upper Heyford Conservation Area and adjoining the Rousham Conservation Area (RCA). Given the significance of Rousham and Historic England's explicit statement of the contribution that its setting makes to its significance in the National Heritage List for England (NHLE) entry, it is imperative a proposal for redevelopment is considerate of the significance of the identified heritage assets. It is noted that the site is also located near to Middleton Park (Grade II), Aynho Park (Grade II) and Kirtlington Park (Grade II) and as such, regard must also be paid to the impact that the proposed redevelopment may have on the setting, specifically that part which contributes to their significance, of each.

Grade I RPGs are the highest possible landscape designation, denoting exceptional interest. Consequently, and in line with paragraph 212 of the National Planning Policy Framework (NPPF), great weight should be given to their conservation and "the more important the asset, the greater the weight should be". A review of the accompanying documentation indicates that

the proposed redevelopment may cause harm to the significance of the RRPg, and the RCA which have an established shared setting, and Aynho Park and Middleton Park. Specifically, the potential harm identified is to the setting of the RRPg, the RCA, Aynho Park and Middleton Park which in turn contributes to their significance.

Significance of the RRPg

Regarding the RRPg's setting, the NHLE entry states the following: *"the largely rural setting is very important, especially in views north and east from the house, garden and pleasure grounds. Kent intended extensive views across the flood meadows north of the Cherwell, and farmland beyond, to local villages, in particular the church towers and villages of Steeple Aston, Upper and Lower Heyford and Rousham itself..."*. Historic England is explicit in stating and acknowledging the importance of the RRPg's setting and thereby the contribution that it makes to its significance.

William Kent was an extremely influential landscape architect, largely responsible for introducing a more informal style of landscape design which would later become the predominant style within the eighteenth century. The RRPg is the "most complete surviving example of Kent's landscape work" (NHLE) and, as set out in the previous paragraph, setting was integral to Kent's design. As a result of the legibility and integrity of the surviving landscape, the RRPg is considered of national importance, being a rare unaltered example of Kent's work.

Significance of the RCA

Under "key Characteristics" within the Rousham Conservation Area Appraisal it states that the Conservation Area includes *"a portion of the Cherwell Valley within Cherwell District that forms the landscape setting for the gardens at Rousham Park."* More specifically, it sets out twelve key views which are considered to contribute to the "character and appearance of the conservation area". The RCA aids in maintaining and protecting the rural setting of the RRPg and more specifically was designed to *"assist with the management of the wider landscape which does not fall within the Registered Parkland boundary."* Consequently, the proposed redevelopment is regarded as not only impacting the setting of the RRPg but also the significance of the RCA and its role in protecting the RRPg's setting and thereby how it is experienced. Regard should therefore be paid to section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 which addresses conservation areas and specifically that part which states that *"special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."* This is of particular importance because part of the proposed redevelopment site (Southern Hamlet West) lies within the RCA.

Significance of Middleton Park and Aynho Park

Middleton Park includes the remains of pleasure grounds dating to the early eighteenth century which are surrounded by an eighteenth to early nineteenth century landscape park. The village of Middleton Stoney is located to the east and Caulcott village is situated to the northwest. The setting of Middleton Park is largely characterised by agricultural fields which provide a backdrop to the pleasure grounds situated to the north of the house.

Lancelot Brown laid out the landscape park at Aynho Park in 1760. The lawns and pleasure grounds are largely situated to the west and south of the house away from Aynho village to the north. The lawn includes *"spectacular views both south over the park and especially west over the Cherwell Valley"* (NHLE) though it is recognised that views to the west have been altered due to the construction of the M40. Further views across the park are provided at the

"semi-circular bastion viewpoint" and the Gardens Trust considers that the largely agricultural landscape which surrounds the park contributes to these views.

The settings of both Middleton Park and Aynho Park are characterised by agricultural fields that impact how they are experienced.

Proposals and Impact

Setting of the RRPg

Due to the absence of a complete Landscape and Visual Impact Assessment (LVIA), and some weaknesses in the Heritage Impact Assessment (HIA), we are currently unable to categorise the level of harm the proposed redevelopment is expected to cause to significance. We believe that the case has not been adequately made to support the conclusion in the HIA that "very low" less than substantial harm would be caused to the significance of the RRPg and the significance of the RCA. The HIA recognises that *"setting makes an important contribution to the appreciation and significance of the RPG."* Specifically, it notes that *"there are numerous views into, out of and across the RCA, and these views are fundamental to William Kent's landscape design and to the value of the RCA"*. The HIA later states in paragraph 10.18 that *"the part of the site within the RCA makes a limited positive contribution to the value of the RPG as part of its agricultural landscape setting within the Cherwell Valley"*. However, there is little articulation of the analysis and reasoning behind this statement which, coupled with an incomplete LVIA, does not allow for a conclusion on the level of harm to be made.

The above statement which references numerous views acknowledges the important connection between the RRPg and the RCA which we are in agreement with, however, no comfort is provided within the HIA or the LVIA in its current version that these have been fully interrogated and specifically those which take in the part of the site that is proposed to be redeveloped. This is of particular concern considering that the HIA notes that *"there is the potential for visibility within a number of the key designated views"* set out within the RCA appraisal including from the Dying Gladiator Statue (Viewpoint 32). The redevelopment proposal would *"introduce glimpses of modern built form on the horizon through gaps in the tree canopy"* which would *"potentially distract from the pervading rural, informal character of the view and result in a degree of harm"* (paragraph 10.10). Views to the surrounding agricultural landscape from key statues and buildings within the RRPg are integral to Kent's design and it is considered that the obscuring of these views, which have for so long remained intact, is unacceptable and would significantly alter how the RRPg is experienced. Due regard should be paid to the guidance set out within Historic England's *The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)* which in particular states that *"views which contribute more to understanding the significance of a heritage asset include those where the composition within the view was a fundamental aspect of the design or function of the heritage asset."*

The HIA identifies that the *"harmful affect"* of the redevelopment on the RRPg *"is limited to the potential distraction deriving from the contrasting scale and character of the proposed development"* and that the development would *"introduce modern built forms as peripheral features in views from within the designed landscape setting."* It is imperative, therefore, that a thorough LVIA assessment which assesses the views to the development from a range of viewpoints within the RRPg, and in particular those that are listed within the RCA appraisal, is provided. It should also assess co-visibility between the RRPg and the RCA. We therefore recommend that you request an updated LVIA which provides further viewpoints and analysis with direct reference to the RRPg and its setting (with a particular emphasis on the RCA).

The assessment notes that views to the site from the RRPg will be *"heavily filtered by interposing vegetation, particularly during the summer months."* This, however, does not consider other factors such as noise or light which can impact upon experience and is considered too simplistic an approach to the assessment of how setting can impact the significance and experience of the RRPg. As part of the consideration for redevelopment within the setting of the RRPg, it is important that such factors are taken into consideration. We would particularly like to highlight the points set out under 'Designated settings' within *The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)* which emphasise that *"development further afield may also affect significance, particularly where it is large scale, prominent or intrusive"* (page 5).

Setting of Middleton Park

Factors including those presented above should also be taken into consideration when assessing the impact that the proposed redevelopment may have on Middleton Park, a grade II RRPg which lies 500m to the south of the site. The HIA states in paragraph 7.125 that *"in its current form, the site is not visible in the context of the RRPg and makes no contribution to the experience or appreciation of the receptor"* however, in paragraph 11.27, it notes that the proposed development *"would introduce a visual change to the skyline in glimpsed views to the north from within certain parts of the RRPg, notably open areas of parkland or areas that have already been altered through modern agricultural use"*. Unfortunately, the LVIA does not provide a complete photomontage of these views, and we are therefore unable to form a complete view on the impact. Further assessment as to how the proposed redevelopment including the impact factors such as light, *"noise, dust and vibration from other land uses in the vicinity"* may affect the setting and thereby experience of Middleton Park is required. We believe the conclusion that there *"would be no material change to the appreciation of the RRPg from within its boundaries"* has not been sufficiently substantiated considering the extent of change that has been identified and that this requires further justification.

Setting of Aynho Park

Regarding Aynho Park, the HIA notes that the redevelopment would be *"most conspicuous from the higher ground and ridge running east-west across the RRPg"* and that the *"scale, massing and modern form of the proposed development would be perceptible on the skyline in views south from the highest point of the RRPg"* (paragraph 11.52). Consequently, the proposed redevelopment has the *"potential to distract from an appreciation of the commanding view across the RRPg from the south terrace of Aynho Park house"* and the HIA concludes that it will result in harm that is at the very low end of *"less than substantial harm"*. It is specifically stated within the NHLE entry that the landscape includes views south across the park and the Gardens Trust considers that the largely agricultural setting to the park positively contributes to these views, providing a sympathetic backdrop to the park and connecting it to the wider landscape much as it would have originally done when it was first designed. It is recognised within the NHLE entry that the M40 negatively impacts views from within the park and thus there is concern regarding the culminative impact the proposed redevelopment will have on the setting of Aynho and thereby how it is experienced. We would like to draw attention to Historic England's advice on culminative change within Planning Note 3 and more specifically that *"where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset."* The Gardens Trust considers that the proposed

redevelopment combined with the effects of the M40 has the potential to further detract from the contribution that setting makes to Aynho Park's significance due to the impact it will have on key views resulting from the density and scale of the proposed buildings.

The Gardens Trust believes that the case has not been adequately made to support the conclusion that the proposal will lead to less than substantial harm due to the fact the proposal will significantly alter the "*commanding*" vista by introducing overtly modern built forms within a predominantly agricultural landscape which is currently void of development of the scale and density that is proposed. This in turn could impact on how Aynho Park is experienced not just visually but through factors such as light and noise, particularly when combined with the effects of the M40.

The effect of density, scale, and design

The Gardens Trust recognises that the redevelopment of the former Upper Heyford airbase forms part of the local plan, however, it is noted under 'Development Description' as part of *Policy Villages 5: Former RAF Upper Heyford* that the "*site will provide for a settlement of approximately 1,600 dwellings (in addition to the 761 dwellings (net) already permitted)*". The scale of development set out within this section of the local plan reflects the sensitivity of the site and its potential to impact upon several designated heritage assets. The current proposal seeks permission for up to 9,000 dwellings on the site, an increase which is not considered to be reflective of the site's sensitivity and the impact that may arise from a development of this scale. Therefore, we would like to express concern regarding the density, scale and design of the development and its potential to impact upon key views and the setting of several designated heritage assets. We would like to emphasise that any development must ensure it is sensitive and responsive to its rural context and the historic environment. In particular the proposed redevelopment should be compliant with *Policy ESD 15: The Character of the Built and Historic Environment* of the Cherwell Local Plan which states that new developments should "*conserve, sustain and enhance designated and non-designated heritage assets*" including conservation areas and their settings and "*ensure new development is sensitively sited and integrated*". Further to this, the redevelopment should be in line with the guidance set out under *Policy Villages 5: Former RAF Upper Heyford* within the Cherwell Local Plan, specifically that "*new development should also preserve or enhance the character and appearance of the Rousham, Lower Heyford and Upper Heyford Conservation Area...and their settings*" and "*the scale and massing of new buildings should respect their context*" (page 260-261).

Whilst there are concerns regarding the density of development across the site and the introduction of buildings up to 42m, we would like to specifically express our concern regarding the density of the development and the scale and design of the buildings within the proposed southern perimeter hamlet, to the south of the existing development (the 'Old Town'). This section of the site is that which is located closest to both the RRPg and Middleton Park RRPg and at present is comprised of agricultural fields which act as a buffer between the Old Town and the RRPg and Middleton Park RRPg and consequently, do not intrude in views towards the site from the latter due to the land remaining undeveloped. Further to this, the extant buildings which form the southern boundary of the Upper Heyford site are largely comprised of bungalows and are therefore unobtrusive due to their small scale.

The proposed buildings within the southern perimeter hamlet are to be of low to medium density with building heights predominantly being 13m with some reaching as far as 18m (DAS, p175). It is considered that these building heights are not responsive to the sensitivity of their location, being on the boundary closest to the RRPgs and are not reflective of the extant

buildings which are small scale. As a result, when combining the proposed development with those extant buildings which form part of the Old Town, there is concern that the development will create a cumulative negative impact upon both the RPG's setting because of the increase in, and scale of, built form within this area. The increase in built form and scale along the southern boundary when combined with the wider redevelopment site (which includes buildings of 28m and 42m) risks the erosion of the predominantly agricultural landscape setting and the characteristic small-scale villages that define and characterise the surrounding landscape. It is therefore considered that the proposal does not comply with policy *ESD 15* nor those points set out within *Policy Villages 5* of the Cherwell Local Plan.

Further to this, the increase in building height within this section of the redevelopment when combined with the overall scale of the site is particularly concerning as it has the potential to negatively impact how the RPG's are experienced through increased light emission (particularly in winter) and the views towards built development which is of a density and scale which is not currently present within the surrounding landscape. There is also concern that development within this southern section of the site will set a precedent for large scale developments within the setting of the RPG's and, in particular, in sensitive areas which positively contribute to their significance and is something which should be avoided.

The specific impact on Rousham's significance attendant with the overall scale and density of the proposed buildings is identified within the HIA in which it states, "*the scale, density and height of the Proposed Development would potentially result in greater visibility of modern built forms, including tall buildings and wind turbines from within the RPG. This has the potential to impinge on the visual relationship between the RPG and the pervading rural character of its setting to the northwest*" (paragraph 10.21, page 87). This disruption between Rousham and its setting, an aspect which directly contributes and forms part of Rousham's significance, is considered unacceptable. Consequently, we would like to recommend that the density of development within the southern perimeter hamlet is reconsidered and scaled back. As part of this we would encourage that development here is limited to low density only, and that the proposed buildings are domestic in character, comprising only of two storey single family dwellings. Further to this, we would request that the building lines are drawn further back from the redline boundary than what is currently proposed, and that greater screening is put in place.

Policy

Notwithstanding the hybrid nature of the proposal, as the application stands the Gardens Trust considers that it does not meet the requirements of NPPF paragraphs 212 to 214 in that the proposed redevelopment does not adequately conserve the significance of the identified designated heritage assets. The HIA identifies that the proposed redevelopment will result in harm to both the RPPG and Aynho Park however we consider that the level of harm is understated, and that "clear and convincing justification" has not been presented. Whilst there is not enough evidence to determine if the harm to the RPPG is substantial, if it is determined that it is, it should be "wholly exceptional" in relation to a Grade I landscape.

Further to this, the Gardens Trust does not consider that the proposed redevelopment complies with section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 in that it will not preserve or enhance the character and appearance of the RCA. Greater attention also needs to be paid to policy *ESD 15: The Character of the Built and Historic Environment* and several of the points within *Policy Villages 5: Former RAF Upper Heyford* of the Cherwell Local Plan.

Due regard should also be paid to C11 "Protection of the vista and setting of Rousham Park" and C23 "Retention of features contributing to character or appearance of a conservation area" which form part of the *List of Replaced and Retained Saved Policies* of the Cherwell Local Plan

1996 (Appendix 7), and *Policy PD4: Protection of Important Views and Vistas* in the Mid-Cherwell Neighbourhood Plan 2018-2031 (2019).

Conclusion

As well as the concerns highlighted above, The Gardens Trust would like to echo the statements made within the Oxfordshire Gardens Trust's response (11/10/25), in particular the need for greater attention to be paid as to how the construction of a development of this size will affect nearby heritage assets including the RRP, the listed structures within it, and the RCA. As previously stated, views are key in understanding the significance of the RPG's effected and that setting can also be affected by factors such as "noise, dust and vibration" (Historic England) which can in turn affect how a heritage asset is experienced. Greater attention and evaluation should be paid as to how the development may affect the identified designated heritage assets and the assets within them, and what measures can be put in place to mitigate against such disruption.

It is imperative that the proposed redevelopment sufficiently considers, and mitigates against, the impact of the development on the setting of the identified designated heritage assets, and thereby their significance. Any development which may impact their settings must be sympathetic in character, scale, design, and density and be responsive to the character of the local landscape. It is considered, for the reasons set out within this letter, that the proposed redevelopment in its current form is not responsive to its sensitive location and would result in harm to the significance of the RPG's identified and the RCA. The Gardens Trust would welcome the opportunity to review subsequent variations of the proposed redevelopment in due course.

If you have any further queries, please contact us at this email address, and we would be grateful to be advised of the outcome of the application in due course.

Yours sincerely,

[Redacted Signature]

Consultant Conservation Officer