



Nick Wyke
Cherwell District Council
39 Castle Quay
Banbury
OX16 5FD

29th October 2025

Dear Mr Wyke

25/02190/HYBRID: Heyford Park new town

Thank you for the Extension of Time to consider the proposals relating to the Heyford Park development. We regret that we were not involved at an earlier stage in the consultation process, which we note the developer considered to be wide-ranging. The proposed development has the potential to cause harm to the significance of the Grade I Registered Park and Garden (RPG) at Rousham and the Rousham Conservation Area (RCA). Given the impact of this colossal proposed new town on one of the nation's most important historic landscapes, we are naturally grateful to have the opportunity to comment now.

Significance of Rousham RPG (Grade I, with multiple independently listed structures)

Originally laid out to plans by Charles Bridgeman in 1720s and 1730s, the pleasure grounds at Rousham were enhanced, defined and ultimately immortalised by William Kent between 1737-41. Kent is an acknowledged genius of eighteenth-century landscape design and his gardens at Rousham are widely considered his masterpiece.

Rousham's pleasure grounds have always been, and remain, highly influential. During the eighteenth-century they were the subject of commentary by many distinguished visitors, including Horace Walpole who considered Rousham to be Kent's best work; and Rousham's far-reaching influence on Kent's contemporaries is noted in the National List Entry of 1998. The gardens' continuing importance and relevance today is borne out by the many endorsements gathered from leading contemporary landscape architects, designers, gardeners and commentators by the Friends of Rousham, at <https://friendsofrousham.co.uk/friends/> (accessed 28 October 2025).

Rousham is a rare survival, untouched by interventions post-Kent, or by surrounding development in its all-important views out of the landscape which are intrinsic to the significance of the original designed composition, and which are explicitly referenced in Historic England's listing description.

Rousham's significance is complex, layered and multi-dimensional. For a fuller account of the landscape's significance we refer your Authority to the NHLE description (ID 1000107) and to the many other sources this references.

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The Rousham Conservation Area (RCA)

Part of the proposed redevelopment site (Southern Hamlet West) lies within the RCA. The RCA was formed to “assist with the management of the wider landscape which does not fall within the Registered Parkland boundary.” The proposed development adversely impacts the significance of the RCA and erodes the RCA’s function as a buffer for the RPG.

Twelve views are specifically detailed within the Conservation Area Character Appraisal, which was renewed in 2018. Threats to these views are discussed, and the Appraisal emphasises that “it is fundamental that development in these settlements is sensitively designed and sited to ensure that the international significance of the Rousham landscape is preserved. Development at the settlement edges will be of particular concern”.

The proposals

It is the duty of decision-makers today to ensure that the immense cultural importance of Rousham is understood, protected and celebrated, and that this three-hundred-year-old designed landscape is not damaged by new development in its setting.

We acknowledge that re-development of the Heyford RAF airbase is allocated within the Local Plan; however, this was for significantly less intensive development - 1,600 dwellings as opposed to the 9,000 dwellings proposed.

We do not consider that the current proposals reach the high standards which must be met in order to protect a designated landscape of such rare magnitude.

Setting

We raise particular concern about the absence of a comprehensive Landscape Visual Impact Assessment (LVIA). We consider that proper, technically sophisticated, verified views must be a prerequisite for a development of this scale. Without these, an informed decision -an obligation arising from national policy - is impossible. An LVIA should be considered in conjunction with a comprehensive Heritage Impact Assessment for a comprehensive and transparent assessment of the nature and degree of impact on designated heritage assets.

As set out in the applicant’s own HIA (p.53), William Kent “laid out the park to take advantage of extensive picturesque views of the surrounding rolling valley landscape, so-called ‘borrowed views’. The landscape appears unplanned, natural and informal, but this was central to Kent’s Picturesque design”.

We recommend that your Authority requests a much fuller and more robust LVIA which provides viewpoints and analysis with explicit cross-reference to the RPG and its setting (with a particular emphasis on the RCA), to designated assets within the RPG and to important views, including those in the RCA appraisal.

The Gardens Trust has provided a detailed summary of the deficiencies of this application's impact assessment. We refer your authority to their expert letter of advice dated 29th October.

Built form

As noted above we do not consider that the vast increase in size of the redevelopment, from that allowed in the Local Plan, takes account of the site's sensitivity on heritage grounds, a factor which is explicit within the Local Plan: "Any new proposals within the Heyford Area will therefore need to take account of important views and vistas, avoid coalescence with neighbouring settlements, seek to limit of the impact of development on the surrounding countryside and preserve and enhance the historic environment" (7.14).

The applicant contends that mitigation in the form of soft landscaping will mitigate any negative impact of the acknowledged visual intrusion and distraction of the development on the RPG. We do not agree. Instead, there should be a fundamental reassessment of built form within the Masterplan: proximity to boundaries, scale and density, impact on views and impact on light and noise levels – as according to Historic England's guidance 'The Setting of Heritage Assets, Good Practice Advice in Planning Note 3 (Second Edition).

We reiterate the Gardens Trust's expert opinion that the proposed development does not show adequate consideration of its rural context, and we consider the impingement on this rural character from the redevelopment – which is acknowledged by the HIA - to be inconsistent with local policy.

We advise that fundamental reconsideration of the Masterplan could (and should) help lessen the impact of the new development on the RPG – for example, by siting green public space nearest to the boundary of the designated assets, reducing building heights, alleviating housing density, and re-siting the wind turbines so there is no discernible impact on views out of the RPG. Sensitive integration of the new built elements within the wider landscape is essential to preserve the significance of the RPG.

Again, we echo the expert advice of colleagues at The Gardens Trust in respect of the detailed recommended measures to address a currently unacceptable level of harm to views from the RPG in particular arising from the new development in the southern perimeter 'hamlet'.

Policy

Grade I RPGs are designed landscapes of exceptional interest and are afforded protection in national and local policy.

National Planning Policy Framework (Dec 2024) (NPPF)

"Heritage assets... are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations" (NPPF para 202).



In line with paragraphs 203 and 210, applications should take into account “the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring” and “the desirability of new development making a positive contribution to local character and distinctiveness” and “opportunities to draw on the contribution made by the historic environment to the character of a place”.

In determining applications applicants should describe “the significance of any heritage assets affected, including any contribution made by their setting” and sufficient detail provided to enable Local Planning Authorities to “take this into account when considering the impact of a proposal on a heritage asset” (paras 207 and 208).

Para 212 requires that “great weight should be given to the asset’s conservation” and “the more important the asset, the greater the weight should be” irrespective of the level of harm; and any harm should require “clear and convincing justification” (para 213)

Local Planning Authorities should look for opportunities for new development with Conservation Areas and within the setting of heritage assets “to enhance or better reveal their significance”.

Planning (Listed Building and Conservation Areas) Act 1990

Section 66 states that “in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural and historical interest which it possesses”.

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 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.”

Development Plan

ESD 15 of the Cherwell Local Plan 2011-2031 (2015) concerns “The Character of the Built and Historic Environment” whereby 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”.

The Saved policies of the Adopted Cherwell Local Plan (1996) include C11 “Protection of the vista and setting of Rousham Park” and C23 “Retention of features contributing to the character or appearance of a conservation area”; and Policy Villages 5: Former RAF Upper Heyford. The Mid-Cherwell Neighbourhood Plan 2018-2031 (2019) includes PD4 “Protection of Important Views and Vistas”.

West Oxfordshire’s Local Plan 2031 (adopted Sept 2018) includes EH9 relating to the Historic Environment.



Conclusion

We consider that the proposed redevelopment has the potential to cause irreversible harm to the significance of the Grade I RPG and the RCA (which have a shared setting). The applicant's assessment of harm is not sufficiently rigorous and thereby cannot be considered to be policy compliant. Furthermore, the applicant has not provided detailed evidence to support their claim that the impact of the scheme can reasonably be considered to be at the 'very low' level of Less Than Substantial Harm, as is currently attested by the HIA (p.86).

We reiterate the Gardens Trust's concern that the existing application does not adequately respond to the significance of the Grade I RPG and fails to appreciate its intervisibility with the Rousham Conservation Area. We also support the Garden Trust's recommendations on density, scale and design.

We remind your authority of the unequivocal importance of Rousham, and of its unique stature and significance, which has prevailed intact and undiminished for nearly three-hundred years. It is imperative that this application preserves the significance of the RPG and its setting.

If the recommendations and concerns set out in this letter are not addressed by the applicant, then we advise that the application is refused.

Please keep us informed of further developments to this case.

Yours sincerely

By email

Catherine Armstrong, BA(Hons) MSc
Conservation Adviser, South West

cc.
The Gardens Trust
Historic England