

# Hearing Statement for Matter 6: Sustainable Urban Extensions (SUEs) and Regeneration Opportunity Areas.

## Issue 8 – RAF Scampton – Policy S75

On behalf of Horizon Park Limited

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## Document Management.

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## 1. Issue 8: RAF Scampton – Policy S75

- 1.1. We welcome the opportunity to comment on the Inspector's Matters, Issues and Questions (MIQs) and provide the following responses to selected questions. Our client reserves the right to respond to specific issues raised by the JSPC and other parties within the hearing session.

**Q1: What does the Plan safeguard RAF Scampton for until the site is vacated?**

- 1.2. No comment.

**Q2: Once vacated, what mix of uses and scale of development does Policy S75 permit? Is it appropriate to defer decisions over the use and scale of future development to a masterplan, which would not be subject to examination in the same way as a development plan document?**

- 1.3. The timing of the Ministry of Defence's (MoD) / Defence Infrastructure Organisation (DIO) disposal of RAF Scampton and West Lindsey District Council's (WLDC) decision on a preferred Joint Venture partner to manage, comprehensively masterplan and redevelop the site is such that Policy S75 is drafted without the benefit of certainty on potential future land uses and is therefore entirely, and sensibly, flexible as to what may reasonably come forward at the site, whilst setting key parameters in terms of the constraints and opportunities to be considered as part of any development proposal.
- 1.4. The policy places clear emphasis on the preparation of a masterplan and Horizon Park Limited (HPL) is developing exciting concepts for the site to deliver a comprehensive major mixed-use development, supported by appropriate infrastructure improvements to serve the site and wider community. Safeguarding flexibility of land uses in the emerging policy wording is key to ensure future proposals at RAF Scampton can deliver on ever changing social, environmental, and economic priorities, respond to market conditions and reflect the requirements and aspirations of the local community and key stakeholders following the formal disposal of the site by the MoD.
- 1.5. The masterplan approach to the future development of the site as set out in Policy S75 is supported. The masterplan approach is considered to be reasonable in the context that the principle of development is firmly established at this significant previously developed (brownfield) site and the masterplan will be key to ensuring that any future development of the site is holistically planned. It will be necessary for the masterplan and spatial framework for the site to continue to develop as the full opportunities and constraints of the site are crystallised through the MoD/DIO disposal process. However, Policy S75 clearly sets out at the outset the guiding principles and objectives that the site will be expected to deliver, including infrastructure and environmental improvements, which are fully supported.
- 1.6. The whole of RAF Scampton is considered to comprise brownfield land given the functional and ancillary inter-relationship between the existing built-up and the more open areas of the site. There are clear and obvious benefits associated with a comprehensive approach to the remediation and redevelopment of the site through the masterplanning process, which can act as a catalyst for environmental improvements consistent with the draft policy requirements to deliver Biodiversity Net Gain and provide a stimulus and encouragement for prospective new occupiers. As part of this, it is considered that Policy S75 should take the opportunity to

define RAF Scampton as a wholly brownfield site for the avoidance of doubt, to encourage investment and to foster a comprehensive approach to the future planning of the site.

- 1.7. It is anticipated that the masterplan will take the form of a Supplementary Planning Document (SPD) or similar, and therefore whilst not subject to the same independent examination process as a Development Plan Document (DPD), such as the Local Plan, an SPD would nonetheless be required to go through extensive public and stakeholder engagement and committee review and approval processes prior to adoption. Accordingly, an appropriate level of public scrutiny remains to ensure transparency in the masterplanning process, particularly in determining the eventual land uses, the scale, massing, and distribution of development across the site and due consideration of appropriate supporting infrastructure requirements. Such an approach is welcomed where this will avoid undue delays to the process and encourage investment decisions and ultimately support timely delivery on-site.
- 1.8. It is further recognised that the development of the site represents a significant challenge given its scale, particularly in respect of supporting infrastructure requirements, however it is fully anticipated that the Infrastructure Delivery Plan (IDP), as a 'live' document which sits alongside the Local Plan, can be appropriately updated throughout the course of the Local Plan period to reflect the infrastructure needs arising from the development proposals and identify the extent and sources of funding necessary to support the redevelopment of RAF Scampton.
- 1.9. As such, the proposed policy approach and the requirement for a comprehensive masterplan is considered to be 'sound', subject to additional recognition within the policy text that the site represents a wholly previously developed (brownfield) site.

**Q3: What is the justification for considering the 'value' of the airspace above RAF Scampton and within 5 nautical miles of its centre, including for any ongoing need for use by The Red Arrows? How would this be determined as part of a planning application process?**

- 1.10. It is right that the 'value' of the airspace above RAF Scampton is fully considered in any development proposals given the sites deeply ingrained military past and the statutory protection afforded by the Air Navigation (Restriction of Flying) (Royal Air Force Scampton) (Restricted Zone EG R313) Regulations 2016.
- 1.11. At the present time there is no other 'approved' airspace that meets the practicing needs of the Royal Air Force Aerobatic Team (RAFAT), however it is clear that the MoD/DIO intends to dispose of RAF Scampton free of any encumbrances and correspondence from Government Ministers confirms that the development of the site takes precedence, and that the airspace does not represent an insurmountable constraint to development, whereby:

*"The ability of the Red Arrows being able to continue to train in the airspace above RAF Scampton will be contingent on the scale and nature of the development delivered at the base. The RAF will continue to use the airspace above the site while that remains possible. However, if development proceeds which prevents this from continuing on safety grounds the RAF will engage with the CAA to explore alternative airspace in Lincolnshire". [Sir Edward Leigh MP, dated 28th May 2021]*

- 1.12. The designation of RAF Scampton as an 'Opportunity Area' recognises the disposal of the site and Policy S75 ensures that a framework is in place to help deliver the significant opportunities presented by the site in a sustainable way. HPL supports the draft policy wording insofar as it

requires the airspace above the site to be fully understood, including for the ongoing need for airspace for use by the Red Arrows and other ancillary needs. Where a value for the retained use of the airspace can be attributed it may be appropriate to incorporate into the masterplan for the site, however, it is not considered that such use of the airspace should be prioritised as currently drafted such that this comes at the expense of delivering sustainable development which might otherwise deliver significant environmental, social, and economic benefits. It is important that the emerging policy takes a more balanced approach and provides flexibility so as not to miss the unique opportunity presented by the site to deliver a successful place.

**Q4: What evidence has been prepared to support the allocation of the site and demonstrate the likelihood of an alternative scheme coming forward, having particular regard to impacts on heritage, highways and the provision of necessary infrastructure?**

1.13. No comment.

**Q5: In the event that the RAF leave the site, what is the justification for criterion k)?**

1.14. No comment.

**Q6: Policy S75(m) requires future development proposals to demonstrate that they are deliverable and viable. Is this not a requirement of the policy itself?**

1.15. Indeed, it is considered that any proposals at the site will necessarily be required to demonstrate deliverability as part of the masterplanning process and as such it is perhaps unnecessary to specifically state this in the policy wording. However, there is also no harm in including criteria (m) and it is a helpful reminder to all parties to ensure that proposals at RAF Scampton are based in commercial reality in order to deliver a successful place and the significant associated benefits afforded by this site.

**Q7: Is criterion (g) achievable and effective given the nature of the site and potential for reusing buildings?**

1.16. Yes, criteria (g) is achievable and effective. HPL are committed to environmental sustainability and are seeking to bring forward a net zero carbon scheme to inspire future occupants, businesses, and visitors to make sustainable changes and will work collaboratively with partners and stakeholders to deliver this sustainable vision for RAF Scampton.

Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

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