

# **PROOF OF EVIDENCE**

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In respect of

**OUTLINE APPLICATION FOR RESIDENTIAL  
DEVELOPMENT OF UP TO 230 DWELLINGS ADJOINING  
CHILGROVE DRIVE AND CAMP ROAD, HEYFORD PARK,  
OXFORDSHIRE**

**PINS REF: APP/C3105/W/23/3326761**

**LPA REF: 21/04289/OUT**

On behalf of

**Cherwell District Council**

**AHC REF: ND/9643**

**Date: November 2023**

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## QUALIFICATIONS AND EXPERIENCE

NICHOLAS DAVID BARTHOLOMEW DOGGETT, BA, Ph.D., Cert. Archaeol., FSA, MCIfA, IHBC, Managing Director of Asset Heritage Consulting, will say:

After reading archaeology and history at the University of Southampton and completing a postgraduate qualification at the University of Oxford I worked for several years as an archaeologist, both in the United Kingdom and abroad. From 1984 to 1988 I was employed on the English Heritage Resurvey of listed buildings in Shropshire, Oxfordshire and Cornwall. From 1988 to 1989 I was a member of the Conservation Team at Bedfordshire County Council before joining South Oxfordshire District Council, where I was head of Conservation from 1991 to 2002, before leaving for CgMs in October 2002, of which I was a Director from 2004.

I left CgMs in November 2010 to establish Asset Heritage Consulting, a specialist heritage consultancy based in Oxford but working across the country.

My doctoral research on 16<sup>th</sup>-century English architecture was completed in 1997 and has subsequently been published. I am a member of the Institute of Field Archaeologists and the Institute of Historic Building Conservation. I was elected a Fellow of the Society of Antiquaries of London in 2016.

I am the author of two books and several articles and papers on archaeology, building conservation and architectural history, including contributions to the *Oxford Dictionary of National Biography*, and have given lectures and taught on summer schools on these subjects for Oxford University Department of Continuing Education and many other organizations. I was formerly committee secretary of the Buildings Special Interest Group of the Chartered Institute for Archaeologists and a committee member of the Oxfordshire Architectural & Historical Society.

In the private sector my clients have included Bournville Village Trust, numerous Oxford colleges, several Local Planning Authorities, the Metropolitan Police, the Home Office and various major house builders. I have also acted as a consultant for English Heritage and Cadw on applications for listing, re-grading, de-listing and Certificates of Immunity. I have given evidence relating to the historic built environment at many public inquiries and hearings and in court, both for appellants, third parties and local planning authorities.

As part of my instruction from the District Council (see Section 1.0 below) I have, of course, visited the appeal site and surrounding area and believe that my qualifications and experience make me an appropriate person to give heritage evidence on the Council's behalf to this inquiry.

In providing this evidence I have also taken full account of the representations of others on the appeal.

Finally, and in accordance with PINS 01/2009, I confirm that the evidence I have prepared for this appeal is true, has been prepared and given in accordance with the guidance of my professional institutions and that the opinions expressed in it are my true and professional opinions. I am fully aware that my duty is to assist the inquiry irrespective of where my instructions arise.

## **1.0 INTRODUCTION AND SCOPE OF EVIDENCE**

- 1.1 This proof of evidence, which should be read in conjunction with the other documentation submitted on the appeal proposals by Cherwell District Council ('The Council') to this inquiry, examines the question of whether the proposals are acceptable in heritage terms given the site's proximity to the RAF Upper Heyford Conservation Area and the various designated and non-designated heritage assets it contains.
- 1.2 The Council's heritage-based reasons are set out in Refusal Reason 1, which reads as follows: *'The site is located on greenfield land outside the Policy Village 5 allocation, therefore within an area of open countryside separate from the built-up area of Heyford Park. As a result, the development would have a poor and incongruous relationship with the form and character of Heyford Park, by reason of the site's general openness. The site's relationship to the RAF Upper Heyford Conservation Area and the views into and out of the Conservation Area would cause harm to the setting of designated heritage assets. Such environmental harm is considered to be less than substantial, but the harm caused is not outweighed by the public social and economic benefits. In addition, the Council is able to demonstrate a 5.4-year housing land supply, and therefore the housing strategies in the Local Plan are up to date. It is considered that the development of this site would conflict with the adopted policies in the Local Plan to which substantial weight should be attached. The principle of this development is therefore unacceptable, as contrary to Policies PSD1, ESD1, ESD13, ESD15, and Policy Villages 5 of the Cherwell Local Plan 2011-2031, Policy PD4 of the Mid Cherwell Neighbourhood Plan, Saved Policies C8, C30, C33 and H18 of the Cherwell Local Plan 1996 and Government Guidance in the National Planning Policy Framework'.*
- 1.3 In addition to considering the statutory tests set by Section 66 and 72 of the Planning (Listed Buildings & Conservation Areas) Act 1990, this proof pays particular attention to the Government's guidance on the historic environment contained in the National Planning Policy Framework (NPPF) and the accompanying National Planning Policy Guidance (NPPG), together with Historic England's NPPF and PPG-compliant *'Historic Environment Good Practice Advice in Planning Note 3- The Setting of Heritage Assets'* (second edition, December 2017) (Core Document [CD] List Table K - 1).
- 1.4 My own involvement in the appeal site dates to early October this year when I was contacted by the Council to consider whether I would be prepared to act as a heritage witness on their behalf at the forthcoming public inquiry. Having examined the

papers I was sent at that time, I confirmed to the Council that I would indeed be prepared to prepare evidence and appear at the inquiry on their behalf, visited the site and surrounding area, and have prepared this proof of evidence accordingly.

- 1.5 For all the reasons set out in the body of this report, it is my professional opinion that the appeal proposals cause a significant (albeit 'less than substantial') degree of harm to the setting of the directly adjoining RAF Upper Heyford Conservation Area, which contains several designated and non-designated heritage assets, including the hardened aircraft shelters located close to the northern boundary of the site.
- 1.6 Put simply, the appeal site does not lie in an area allocated for housing, and in heritage terms this is the wrong scheme in the wrong place, it being very clear that the appeal proposals would cause irreparable damage to the significance of the setting of the conservation area at the mid-level of 'less than substantial harm', as that term is defined and used in the NPPF and PPG.
- 1.7 For all the detailed reasons set out in the body of this proof, I therefore respectfully urge the Inspector to dismiss this appeal.

## **2.0 THE APPEAL SITE AND ITS CONTRIBUTION TO THE SETTING OF THE RAF UPPER HEYFORD CONSERVATION AREA AND ITS SIGNIFICANCE**

2.1 This section of my proof examines the appeal site, which is currently made up of two large pasture fields, in its present form and provides an assessment of the contribution it makes to the setting of the directly adjoining RAF Upper Heyford Conservation Area.

### **(i) Historical Background and Heritage Significance**

2.2 A detailed history of the development of the heritage asset affected by the appeal proposals – the former RAF Upper Heyford Airfield - is provided in the Council's Conservation Area Appraisal of April 2006. There is therefore no need to repeat this here, but it is hoped the summary provided below (taken from this document) will be helpful to the Inspector.

2.3 Like many airbases throughout Britain, RAF Upper Heyford began life as a First World War flying field, with construction starting in 1916 but stopping at the end of the war in 1919. The abandonment of the site by the RAF was however short lived as in 1925 the airfield was redesigned with Upper Heyford becoming the model on which airfields of this type were based during the inter-war years.

2.4 Upper Heyford saw active service during the Second World War and was one of a limited number of bases selected at the end of the conflict for transformation into a purpose-built airbase for Strategic Air Command of the United States Air Force (USAF).

2.5 The work necessary to transform the existing airfield into one for the USAF began in 1950, but as political thought in this field moved away from a strategy of 'Mutually Assured Destruction' to one of 'Sustained Deterrence' - a strategy of retaliation - the requirements of the frontline forces changed. One element of this change was the deployment of F-111E bombers at the airbase, these aircraft having the ability to respond at any time under any conditions, their primary role being to carry intermediate-range nuclear weapons.

2.6 A strategy of retaliation of course simultaneously requires the ability to withstand attack and so with the deployment of the swept-wing bombers came the perception that frontline squadrons and their essential facilities required protected bases from which to operate. It was at this point in the Cold War that the concept of 'Hardened Airfields' came to the fore and with this the construction of widely separated

Hardened Aircraft Shelters, structures that are now regarded as quintessentially typical of the 'Cold War' period.

- 2.7 As noted in the Introduction on p.1 of the Council's Conservation Area Character Appraisal, *'The importance of the site at RAF Upper Heyford is therefore primarily as a Cold War airbase. Its uniqueness is the result of decommissioning in 1993, terminating active military use. The airbase therefore never underwent the evolution into Twenty First century warfare seen at other airfields occupied by the USAF'*.
- 2.8 Furthermore, *'the prominent hardened aircraft buildings... (which are the result of a 1970s') change in mind-set and a change in defensive requirements to match, the enclosure fences around operational areas, the planned layout of the functionally related groups of buildings and the spaces in between, together with 'campus' nature of the site, all contribute significantly to the 'Cold War' character of the site'*, which is intrinsically spacious and open. A map of the conservation area, taken from the Council's Local Plan, showing the heritage assets in the designated area is attached at **Appendix 1**.

## **(ii) Description of the Appeal Site and Surrounding Area**

- 2.9 As noted at paragraph 2.1 above, the appeal site currently comprises two pasture fields directly to the north of Camp Road, with a straight north-south running tarmac-surfaced trackway running to the west of the site leading to what was historically known as Letchmere Farm (and before that as Black Leys Farm) and with the site bounded by Chilgrove Drive (a public right of way, which considerably pre-dates the establishment of the airfield) to the east (see the photographs in The Council's Planning Appeal Statement). Chilgrove Drive follows the course of the Iron Age Aves Ditch, which is still partly visible on land south of Camp Road near Caulcott.
- 2.10 This lane also begins as a tarmac-surfaced track at its southern end before giving way to a narrower section (parts of which are unmade) to the south of the locked gates and security fencing around the former airfield.
- 2.11 The appeal site itself, which has never previously been developed and is not allocated for development or included on the Council's approved Heyford Park Parameters Plan – see the historic maps contained in the final version of the RPS Built Heritage Statement (December 2021), is presently made up of two principal parts: the western, which contains a roughly made trackway (a continuation of the trackway



running immediately inside the hedge along Camp Road) and the eastern, consisting of another large pasture field, adjoining Chilgrove Drive.

- 2.12 The appeal site as a whole includes a number of mature trees and ponds, together with a long-established watercourse (Leys Farm Ditch) and forms a distinct rural edge on the eastern side of Heyford Park, as it did for the historic airfield that preceded its redevelopment.
- 2.13 There are clear views across the appeal site of a group of hardened aircraft shelters on the former airfield from Camp Road close to its junction with Chilgrove Drive, together with further views of these buildings and related structures through the security fence bordering the western side of Chilgrove Drive.
- 2.14 The heritage significance of these views is further discussed below, while it should be noted here that the views along the historic Chilgrove Drive (there are also extensive views over open countryside on the eastern side of this attractive lane) are even clearer when the trees and other vegetation in the hedges on either side of the lane are not in leaf.

**(iii) Assessment of the Appeal Site's contribution to the open setting of the adjoining RAF Upper Heyford Conservation Area**

- 2.15 As will be clear from the above, the appeal site makes a direct contribution to the setting of the RAF Upper Heyford Conservation Area and its significance. It is, of course, not included in the designated area (nor would it be appropriate for it to be so given the clearly defined boundaries of the conservation area and former airbase).
- 2.16 But this is not to downplay the contribution that the open nature of the appeal site makes to the spacious setting of the conservation area and its significance.
- 2.17 Military sites (particularly those belonging to the RAF or USAF) are often in rural areas, which of course is essential to the safe functioning of military airfields, surrounded by security fencing that prevent (or prevented) public access, as is the case at the former Upper Heyford Airbase.
- 2.18 Today the appeal site remains an important (and attractive) element of the open countryside surrounding the former airbase (conservation area).
- 2.19 It is notable that aircraft took off in an easterly direction from the former airfield, it being essential to its proper and safe functioning of the airbase (and its full

understanding and appreciation today) that it was surrounded by open agricultural land to its east.

2.20 Much of the appeal site, particularly the eastern portion, is also directly visible on the approaches to Heyford Park from the east and south and even that which is not adds to the sense of open, rural space that surrounds the former airbase.

2.21 Consideration of the ways in which this important open space and the major contribution it makes to the significance of the setting of the conservation area and how this would be irrevocably changed is provided in Section 3.0 of this proof below.

### **3.0 PLANNING POLICY, THE APPEAL PROPOSALS & THE HERITAGE ISSUES**

3.1 Before looking in detail at the Council's heritage-based elements for Refusal Reason 1 on the appeal proposals, it is helpful first to examine the relevant planning policy background: this can conveniently be broken down into two parts - policy at national level and at local level.

#### **(i) Local Policy**

3.2 The relevant heritage policies (cited by the Conservation Officer in her consultation comments of 12 August 2022 and in Refusal Reason 1) are saved Policy C28 of the 1996 Cherwell Local Plan and Policy ESD15 of the Cherwell Local Plan 2011-2031.

3.3 Policy ESD15 (which relates to proposed new development and its effect on heritage assets) is consistent with the NPPF and is clearly directly relevant to the appeal proposals.

3.4 In my professional opinion, and as discussed below, the appeal proposals very obviously fail to comply with these adopted Policies, particularly on the grounds of proximity and impact on significant views as discussed in detail below.

#### **(ii) National Policy**

3.5 National planning policy on heritage issues is currently enshrined in the NPPF and is accompanied by the NPPG which helpfully sets out how the Government's guidance on how the policy in the framework should be interpreted.

3.6 Reference has also been made in the Introduction to this proof to Historic England's '*Historic Environment Good Practice Advice in Planning Note 3- The Setting of Heritage Assets*' (2<sup>nd</sup> edn., December 2017), - CD Table K - 1.

3.7 In this section I refer first to the relevant heritage policies in the NPPF, before turning to a consideration of the helpful Historic England guidance contained in their 'Settings' document.

3.8 Paragraph 199 of the NPPF states that '*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance' (only the emphasis is mine).*

- 3.9 Paragraph 202 of the NPPF goes on to state that '*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use*'.
- 3.10 It is also helpful to quote here in full the section of the PPG that considers 'What is the setting of a heritage asset and how should it be taken into account?' (only the emphases are mine): '*All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent. The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each. The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time. When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.* (PPG, paragraph: 013, reference ID: 18a-013-20190723 Revision Date 23 07 2019)'.
- 3.11 The application of these NPPF and PPG paragraphs to the appeal proposals is further discussed below.
- 3.12 Historic England's planning advice note on 'Setting' (HEAN 3) builds on and incorporates the advice given in its earlier guidance documents on this important topic and is, of course, very relevant to the heritage issues raised by the appeal proposals.
- 3.13 For instance, at Section 9 is the sensible and pragmatic advice that '*Setting is not a heritage asset, nor a heritage designation, though land within a setting may itself be*

*designated (see below Designed settings). Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance', before going on in the immediately following paragraphs to 'examine some more general considerations relating to setting and significance'.*

3.14 These 'general considerations' are discussed under a series of sub-headings: 'Change over time, Cumulative change, Access and setting, Buried Assets and setting, Designed settings, Setting and urban design and end with 'Setting and economic and social viability'.

3.15 Of these sub-headings, I consider 'Change over time' 'Cumulative Change' and 'Access and setting' to be the most directly relevant to the matters before this inquiry, as the following extracts show: ('Change over time') – *'Settings of heritage assets change over time. Understanding this history of change will help to determine how further development within the asset's setting is likely to affect the contribution made by setting to the significance of the heritage asset. Settings of heritage assets which closely resemble the setting at the time the asset was constructed or formed are likely to contribute particularly strongly to significance...'* (Cumulative Change) – *'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. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing key views of it (see also paragraph 40 for screening of intrusive developments)'. ('Access and setting') - *'Because the contribution of setting to significance does not depend on public rights or ability to access it, significance is not dependent on numbers of people visiting it; this would downplay such qualitative issues as the importance of quiet and tranquillity as an attribute of setting, constraints on access such as remoteness or challenging terrain, and the importance of the setting to a local community who may be few in number...'**

- 3.16 Sections 10 and 11 of HEAN 3 consider 'Views and setting': (10) *'The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset'*; (11) *'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 ...'*
- 3.17 Part 2 of HEAN 3 deals with 'A Staged Approach to Proportionate Decision-Taking', which sets out the five steps necessary to achieve this. Now is the appropriate point in this proof to turn to an examination of the appellants' heritage work to date.

**(iii) The appellants' Built Heritage Statement, General Discussion and the Degree of Heritage Harm caused by the Appeal Proposals**

- 3.18 Before turning to a discussion of the heritage issues central to the Council's Refusal Reason One on the appeal scheme, it is helpful first to consider the findings of RPS' Built Heritage Report (final version, December 2021), which reaches the extraordinary conclusion (paragraph 5.3) that *'The development will result in a small visual change within its setting, but this will be seen within the context of nearby residential areas and will not compete or change the visual and spatial relationships found within the formal extent of the former airbase. Consequently, the proposed development will result in no harm on the significance of the RAF Upper Heyford Conservation Area and non-designated built heritage assets'* (only the emphasis is mine).
- 3.19 For the reasons I have already pointed out in Section 2.0 of this proof, the conclusion that the appeal proposals cause no harm to the significance of the RAF Upper Heyford Conservation Area is neither credible nor sustainable.
- 3.20 The conclusion that no harm is caused to the significance of the setting of the conservation area is particularly hard to follow given that the heritage value of the airfield is (rightly) acknowledged at several points in the RPS Statement, for instance at paragraphs 4.8 and 4.9, which state that *'The 1967 Arab-Israeli Six-Day War exposed how vulnerable aircraft and airfields were from aerial attacks. Consequently, in the 1970s, NATO, under the European Defence Improvement Programme began to 'Hardened Airfields' against conventional, chemical and biological attacks. Buildings relating to the aircraft and the key infrastructure which supported their operation was improved through hardening buildings and structures to ensure that*

*they could survive attacks and mount rapid counter-attacks. This 1970s phase of Cold War improvements was the last major upgrade of the airbase, prior to its closure and disposal in 1993'. (paragraph 4.8). Consequently, the historic importance of RAF Upper Heyford not only illustrates its continuing development within the twentieth century but owing to its completeness, represents an understanding and appreciation of the Cold War period and in the evolution of modern aviation hardware and strategy, which escaped the subsequent changes of twenty-first century warfare measures implemented at other airfields' (paragraph 4.9).*

3.21 Turning now to the question of 'Setting', several strange observations are made in the RPS Built Heritage Statement, including at paragraph 4.21, which states that *'The airfield's location on a plateau (Upper Heyford Plateau) was clearly an important technical and localised consideration in the choice of the original airfield's placement. However, the operational role of the airfield in World War Two and in its later, more significance role as a USAF SAC base during the Cold War, was not intended to interact with, or be integrated into, its surroundings. Except for the airfield's military accommodation (off Camp Road), this was reflected by the relative isolation of the airfield. Additionally, the tall, barbed-wire perimeter fencing serves both as an impenetrable physical barrier between the base and its surroundings and also marks a clear boundary between two landscapes of vastly differing character: the functional Cold War landscape of the airbase, and the surrounding, mostly farming landscape. A reinforcement of this separation has also been achieved from the maturity of tree planting on the edges and surrounding the airbase, which Cocroft (2017) suggests was an intentional implementation of inter-war airfields (onwards), in order to help conceal them from the enemy and to appease local objections over the appearance of the airbases'.*

3.22 Several points emerge from this. First, the reference to barbed-wire fencing is not strictly accurate. It is true that barbed wire is employed in the fencing around the airfield, but it is used primarily only in 'bundles' at the top of the tall chain-link fencing around the former military base, which actually allows clear views across it both from outside and inside the base.

3.23 Indeed, as already observed at paragraph 2.17 of this proof, perimeter security fencing of this sort is entirely typical of military bases, notably former RAF and USAF airfields, where clear views are allowed into bases (as well as out from them), while still providing vital security from potential intruders.

- 3.24 The RPS claim at paragraph 4.22 of their Statement that '*...it is difficult to appreciate the historic and architectural interest of the Conservation Area and the heritage assets located within it from beyond its boundaries*' is simply not correct and does not stand up to scrutiny.
- 3.25 The illustrative masterplan, which forms part of the appeal proposals, shows two-storey domestic-scale housing directly next to the boundary of the conservation area, and in the immediate vicinity of the HAS structures which are identified by the Council as being non-designated heritage assets in their own right. A narrow landscape buffer is also proposed along the sensitive edge of the Conservation Area in an attempt to screen the proposed development from the designated area, but this will clearly not have the desired effect and would also serve to remove intervisibility between the appeal site and the conservation area.
- 3.26 Furthermore, the strong Historic England guidance on the merits of screening or planting around new developments should be noted here: notably, the helpful advice at paragraph 40 of their 'Settings' document (CD- Table K - 1) that '*Screening may have as intrusive an effect on the setting as the development it seeks to mitigate, so where it is necessary, it too merits careful design*'.
- 3.27 Taking the appeal scheme as a whole, it is my considered professional opinion that the loss of open space on the appeal site caused by the appeal proposals would result in a clear degree of harm to the setting of the RAF Upper Heyford Conservation Area given that the contribution that the existing rural setting provides to its significance would be lost for ever.
- 3.28 In my view, the level of harm caused falls at the mid-level of 'less than substantial harm', as that term is defined and used in the NPPF and NPPG.
- 3.29 No amount of tinkering with the masterplan or other plans submitted as part of the appeal proposals can rectify this harm: put simply, this is the wrong scheme in the wrong place in heritage terms.
- 3.30 I therefore respectfully urge the Inspector to dismiss this appeal.



## **4.0 SUMMARY AND CONCLUSION**

- 4.1 Following an introduction in Section 1.0 to the scope of evidence covered in this proof, Section 2.0 describes the appeal site and surrounding area in their present form, together with a description of the historical background to the evolution of the former RAF/USAF Upper Heyford airbase and their subsequent designation as a conservation area, before going on to assess the contribution the appeal site makes to the setting of the conservation area and its significance.
- 4.2 The importance of this contribution derives not only from the clear value that the open and rural nature of the appeal site makes to the spacious nature of the conservation area and its significance but from the fact that the site has never been previously developed.
- 4.3 As such, the appeal site forms an important element of the historic rural landscape surrounding the air base and in fact pre-dates it. A significant historic feature of the pre-airfield landscape is the attractive lane (Chilgrove Drive), which is a public byway that formerly formed part of the Iron Age Aves Ditch (this is still partly visible on land south of Camp Road near Caulcott) and directly adjoins the eastern side of the appeal site.
- 4.4 From this lane, which ends in one of the locked gates and security fencing around the former airfield, where it meets another trackway/bridleway, which runs at right-angles to the east, there are views towards the former airbase, including views of several hardened aircraft shelters and related structures. There are also unimpeded distant views of several hardened aircraft shelters across the appeal site from Camp Road near its junction with Chilgrove Drive.
- 4.5 It is notable that aircraft took off in an easterly direction from the former airfield, it being essential to its proper and safe functioning of the airbase (and its full understanding and appreciation today) that it was surrounded by open agricultural land to its east.
- 4.6 As such, it is the conclusion of Section 2.0 of this proof that the appeal site is an important (and attractive) element of the open countryside surrounding the former airbase (conservation area), which makes a clear contribution to the setting of the RAF Upper Heyford Conservation Area and its significance.
- 4.7 Section 3.0 of this proof begins with an examination of relevant planning policy relating to the Historic Environment at both local and national level, as well as considering Historic England's *'Historic Environment Good Practice Advice in Planning*

*Note 3- The Setting of Heritage Assets'* (2<sup>nd</sup> edn., December 2017) – HEAN 3 (CD – Table K - 1).

- 4.8 I quote in full at paragraph 3.10 above the section of the PPG (PPG, paragraph: 013, reference ID: 18a-013-20190723 Revision Date 23 07 2019) which considers 'What is the setting of a heritage asset and how should it be taken into account?' but in this summary would particularly like to draw the Inspector's attention to the following extracts: 'All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent. The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations.

For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each. The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time. When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.'

- 4.9 The next paragraphs of this proof considers Historic England's planning advice note on 'Setting' (HEAN 3), emphasising those sections that are particularly relevant to the appeal proposals.
- 4.10 At paragraph 3.18 I begin an examination of the appellants' Built Heritage Statement prepared on their behalf by RPS, pointing out its inadequacies and analysing the reasons behind its strange and unsustainable conclusion that the appeal proposals cause no harm to the setting of the RAF Upper Heyford Conservation Area and the significance it draws from this.
- 4.11 For my own part, I remain firmly of the view that the proposed fundamental change of the appeal site from agricultural fields that have never previously been built on into a housing estate can only cause irrevocable harm to what is significant about the setting of the RAF Upper Heyford Conservation Area.

- 4.13 In heritage terms the loss of open space on the appeal site caused by the appeal proposals would result in a clear degree of harm to the setting of the RAF Upper Heyford Conservation Area regarding the positive contribution the existing rural setting provides to its significance.
- 4.14 No amount of tinkering with the illustrative masterplan or the other plans submitted with the appeal proposals can rectify the harm caused by the appeal proposals: put simply, this is the wrong scheme in the wrong place in heritage terms.
- 4.15 In short, for all the reasons set out in the body of this proof, it is my view that the appeal proposals would significantly and irrevocably damage the setting of the RAF Upper Heyford Conservation Area and its significance.
- 4.16 In my professional opinion, the degree of harm that would be caused by the appeal proposals falls at the mid-level of 'less than substantial harm' as that term is defined and used in the NPPF and PPG.
- 4.17 I therefore respectfully urge the Inspector to dismiss this appeal.