

HERITAGE PROOF OF EVIDENCE

THOMAS COPP

OS Parcel 1570 Adjoining and West of Chilgrove Drive, and Adjoining
and North Of, Camp Road, Heyford Park

PINS Reference: APP/C3105/W/23/3326761

LPA Reference: 21/04289/OUT

Heritage Proof of Evidence
V4
November 2023

REPORT

Quality Management

| Version | Status | Authored by | Reviewed by | Approved by | Review date |
|---------|--------|-------------|----------------|-------------|-------------|
| V1 | DRAFT | Thomas Copp | Edward Hawkins | TC | 11.10.2023 |
| V2 | DRAFT | TC | TC | TC | 30.10.2023 |
| V3 | DRAFT | TC | TC | TC | 09.11.2023 |
| V4 | FINAL | TC | TC | TC | 14.11.2023 |

Approval for issue

Thomas Copp TC 14 November 2023

File/Model Location

Document location: Document1

Model / Appendices location:

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Contents

| | | |
|---|--|-----------------|
| 1 | INTRODUCTION | 4 |
| 2 | RELEVANT HERITAGE ASSETS | 9 |
| 3 | APPEAL SITE, SURROUNDINGS AND HISTORIC DEVELOPMENT | 10 |
| 4 | RELEVANT LEGISLATION, POLICY AND GUIDANCE | 2221 |
| 5 | HERITAGE ASSESSMENT | 2928 |
| 6 | CONCLUSIONS | 5049 |

Appendices

Appendix A: References

Appendix B: Designated Heritage Assets Plan

Appendix C: Non-designated Heritage Assets Plan

Appendix D: Historic Map Extracts

Appendix E: Site Photographs

Appendix F: Conservation Officer Comments for application 22/03063/F

1 INTRODUCTION

- 1.1 My name is Thomas Copp and I am a Director of Built Heritage at RPS, having been at RPS for 9 years. I hold a degree (Bachelor of Arts with Honours) in History from the University of Leicester and a postgraduate degree (Master of Arts with Distinction) in Urban Conservation from the University of Leicester. I am an IHBC Associate, accredited in conservation practice that evaluates change in the built and historic environment, and have experience of acting for various clients in the private, public and charity sectors, alongside experience working in the public sector. In my current position I have appeared as a built heritage expert witness at Examinations in Public, Appeal Hearings, Public Inquiries and in the Magistrates Court. My experience includes advising on numerous residential schemes and the conservation and adaptive re-use of heritage assets. This includes ongoing advice for the redevelopment of the Cold War heritage assets at Alconbury Weald, Cambridgeshire.
- 1.2 I have been engaged with this Appeal since its submission in July 2023 and have provided input to the Appellant's Statement of Case and the Statement of Common Ground. I have also drafted the Appellant's inputs to the Heritage Statement of Common Ground. Prior to this, my colleague Thomas Rumley prepared a Built Heritage Statement (BHS) dated December 2021, which formed part of the application submission. I have reviewed the application documents, including the BHS, and I have set out my assessment within this Proof of Evidence to assist with the determination of this Appeal.
- 1.3 I have visited the Appeal Site and surrounding area and conducted a review of the relevant heritage asset from within the Appeal Site on the 19th September 2023.
- 1.4 In preparing this Proof, I have reviewed the application documents and comments, including the consultation comment prepared by the Council's Conservation Officer (dated 12 August 2022). I have also reviewed the Council's Statement of Case, the Statements of Case prepared by 3rd Parties and the CMC Note issued by the Inspector.
- 1.5 The evidence I have prepared and provide for this Appeal (PINS reference APP/C3105/W/23/3326761) in this Proof of Evidence is true and has been prepared

and is given in accordance with the guidance of my professional institution, the Institute of Historic Building Conservation. I confirm that the opinions expressed are my true and professional opinions.

Background and Scope of Evidence

1.6 The Appeal Scheme comprises:

“Outline planning application for the erection of up to 230 dwellings, creation of new vehicular access from Camp Road and all associated works with all matters reserved apart from Access.”

1.7 The application was refused on 31 March 2023 with two reasons for refusal. The first reason relates to heritage and states (with my emphasis added to the relevant parts):

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.

1.8 This followed a consultation response from the Council’s Conservation Officer dated 12 August 2022. This is included in full below:

The land is immediately adjacent to the RAF Upper Heyford Conservation Area on its northern boundary. RAF Upper Heyford is a cold war landscape with a range of designated and non-designated heritage assets including a conservation area, scheduled monuments (one of which is identified as being of international significance), listed buildings and non-designated buildings of national and local significance. Therefore the significance of the site is primarily the contribution it makes to the setting of the conservation area and its multiple heritage assets.

Although the site lies outside of the RAF Upper Heyford Conservation Area because of its close proximity there is a relationship between the conservation area and the site, therefore any development here will change the setting of the conservation area in this location. Particularly development to the northern part of the site. Furthermore these areas of building at the north and northeast parts of the site will come quite close to the hardened aircraft shelters, these are identified as undesignated heritage assets.

Although specific views are not identified, the development will affect views into the eastern part of the conservation area and the new houses will be visible from within the conservation area. It is considered inevitable that generic housing here will result in some harm to the conservation area as a result of development within its setting.

It is accepted that this application is an outline application with access only to be considered and therefore elements of the proposal such as layout and detailed design will be considered at a later stage. However as advised at the pre application stage the emphasis should be on finding a form of development that compliments the airfield. It is also considered that moving the built form away from the conservation area boundary would reduce the harm of the proposal. Design and materials will also be key to an acceptable development.

It is inevitable that development of this site will result in some harm to the heritage assets as a result of changes to their setting, however it is considered that with the right layout and design this harm could be notably reduced.

- 1.9 Heritage matters were considered in the Committee Report under the heading *Impact on the Character & appearance of the locality & designated heritage assets*. This concluded (see paragraphs 9.42 and 9.43) that:

The impact on the designated heritage (Conservation Area) asset needs to be considered. The site does not lie within the CA but it is approximately 60m away. Therefore, consideration has to be had to its overall setting. The Conservation Officer has raised concerns that there would be a harmful impact to the setting of the Conservation Area given the distance to the application site. That could be reduced with a correct layout and design. Although there is an indicative masterplan for the site, this could be altered at the reserved matters stage to lessen the impact on the designated heritage assets. The overall harm to the heritage assets is considered less than substantial. Therefore, the public benefits of the proposal will have to be weighed against the level of harm caused in accordance with paragraph 202 of the NPPF.

There are several public benefits, including boosting the supply of housing for the locality, including affordable dwellings in a sustainable location. The proposal would also support economic growth. Although the impact could be reduced at the reserved matters, it would likely still lead to less than substantial harm, but the public benefits already mentioned would in your Officers opinion outweigh the harm caused to the designated heritage assets.

- 1.10 It is therefore important to note that, in the Council's view, any harm to the significance of the neighbouring designated heritage asset (RAF Upper Heyford Conservation Area) would be "less than substantial" in magnitude and that there are opportunities to further reduce and mitigate this harm through appropriate design measures provided at reserved matters stage. The reason for refusal identified harm to only a single designated heritage asset, the RAF Upper Heyford Conservation Area (described using its full name and as the Conservation Area within this Proof).
- 1.11 The BHS submitted with the application also assessed the significance of two relevant non-designated heritage assets located within the Conservation Area, the grouping of seven Hardened Aircraft Shelters located within the south-east part of the Conservation Area and the Southern Bomb Stores. For completeness, and to ensure all potential impacts to relevant designated and non-designated heritage assets are considered, these heritage assets are also assessed separately within this Proof of Evidence.

- 1.12 This Proof of Evidence focuses only on the heritage impacts of the Appeal Scheme, with all planning matters covered by Mr Bainbridge in his Planning Proof of Evidence.
- 1.13 This Proof of Evidence provides an assessment of the significance of the relevant heritage assets and the impacts that the proposed development of the Appeal Site will have on that significance, in accordance with the “5-step” process set out in *GPA3: The Setting of Heritage Assets*.
- 1.14 It is structured to:
- Identify those heritage assets relevant to this Appeal
 - Describe the Site and relevant heritage assets, and provide a description of their changes over time
 - Outline the relevant legislation, policy and guidance
 - Assess the significance of the heritage assets, with regard given to any contribution made by their settings
 - Assess the impacts to this significance, with regard to relevant design or mitigation measures
 - Discuss whether the proposals comply with relevant legislation, policy and guidance
- 1.15 All plans and photographs within the Appendices to this Proof are provided for illustrative purposes only.

2 RELEVANT HERITAGE ASSETS

- 2.1 The Reason for Refusal only identifies a single designated heritage asset, the RAF Upper Heyford Conservation Area (described as either the RAF Upper Heyford Conservation Area or the Conservation Area within this Proof). The Conservation Area is a designated heritage asset and includes a scheduled monument and five Grade II listed buildings. These other designated heritage assets are sufficiently separated from the Site and will not be affected by the proposed development. This was set out at paragraphs 3.25-3.28 of the BHS, which clarified that these designated heritage assets are sufficiently separated from the Site to ensure that they will not be affected by the proposed development.
- 2.2 The Conservation Area also includes a series of non-designated heritage assets, which are shown on CDG.5; Figure 7. The Hardened Aircraft Shelters are located within the south-east part of the Conservation Area close to the Site boundary and are visible from areas of the Site. Due to this proximity and visual relationship they were identified separately within the submitted BHS and assessed as part of the Conservation Area. To ensure their significance is fully assessed within this Proof of Evidence, they are considered separately, cognisant of the contribution that they make to the significance of the Conservation Area as a whole. The Southern Bomb Stores also lie at the southern extent of the Site and were assessed within the BHS. They are considered within this Proof of Evidence for completeness.
- 2.3 The relevant heritage assets are therefore:
- RAF Upper Heyford Conservation Area (designated heritage asset)
 - Seven Hardened Aircraft Shelters within south-east extent of RAF Upper Heyford Conservation Area, identified as Buildings 3037, 3038, 3039, 3040, 3041, 3042, 3064 (non-designated heritage asset)
 - Southern Bomb Stores within the RAF Upper Heyford Conservation Area (non-designated heritage asset)
- 2.4 These heritage assets are shown on Appendix C. Section 5 of this Proof provides an assessment of their significance, with regard given to the contribution made by their settings and the impacts to their significance arising from the development proposals. This follows the “5-step” process set out in CDK.1 (see paragraph 4.20).

3 APPEAL SITE, SURROUNDINGS AND HISTORIC DEVELOPMENT

- 3.1 The history of RAF Upper Heyford has been explored in the submission BHS and various research documents, notably *Former RAF Upper Heyford Conservation Plan* (ACTA, Oxford Archaeology & The Tourism Company; 2005), *RAF Upper Heyford Conservation Area Appraisal* (Cherwell District Council; 2006) and *Former RAF Upper Heyford, Cherwell, Oxfordshire: A reassessment of the flying field Conservation Area*; Cocroft, W; 2017)¹. Further information relating to the history and importance of the airfield is provided in the scheduling description provided by Historic England (CDK.4). The Conservation Area and its significance has also been considered in detail as part of previous applications and appeals, including at the public inquiry for appeal APP/C3105/A/08/2080594 (and relevant linked appeals)². The historic development of the airfield is summarised below, with recent changes to the airfield, its setting and the Site also described. This is intended as a summary of the key phases only, with the documents listed above providing a fuller appraisal of the historic development of RAF Upper Heyford.
- 3.2 An airbase was established at Upper Heyford during the First World War, with construction commencing in 1916 and the airfield opened in late 1918. The airfield included a landing field, six hangars and a tarmac hangar apron³. 11, 157 and 158 Squadrons were based there although the war ended before the squadrons became active and the airbase reverted back to the ownership of New College Oxford following the cessation of hostilities⁴.
- 3.3 Shortly after, the airbase was re-purchased by the President of the Air Council in 1924 and expansion of the airfield commenced. The Oxford University Air Training Squadron began flying from the base in 1927. The Plan notes that *Upper Heyford*

¹ These documents are included as CDK.3, CDG.5 and CDK.2 respectively.

² [The Appeal Decision is provided as CDN.3 with the Inspector's report provided as CDN.4.](#)

³ [CDK. 3: Former RAF Upper Heyford Conservation Plan \(ACTA, Oxford Archaeology & The Tourism Company; 2005\), p.21; paragraph 2.6.1.](#)

⁴ [CDK.3: *Ibid.* p.21; paragraph 2.6.1.](#)

was the model on which airfields of its type were based in the period 1925-1934⁵. It was during this period that significant ancillary structures and accommodation were constructed. This included the Officer's accommodation to the north of Camp Road and the technical area, which included structures for the maintenance of the aircraft. Additional accommodation south of Camp Road was also constructed during the inter-war period, with the footprint of the airfield expanding beyond the Flying Field to the south⁶.

- 3.4 Upper Heyford further expanded in the 1930s due to the growing threat of war and was used as a training base for Vickers Wellesley bombers. By 1939, the airfield is described in the Plan as consisting of *a core of hangars and maintenance buildings and residential accommodation with a grass airfield to the north⁷.*
- 3.5 The airbase was predominantly used for training during the Second World War, with the airfield finally upgraded to include a concrete runway by 1944. In 1942 the airbase was briefly used for bombing raids on the Ruhr, but otherwise was used for training activities and the development of military radio and radar technology.
- 3.6 In the years following the Second World War the airbase remained as a training base, however escalating tensions during the Cold War ushered in the next, and most important, phase in Upper Heyford's history. In 1950 the government approved the formation of permanent United States Air Force bases in Britain, with Upper Heyford becoming one of the principal Strategic Air Command bases in Britain. Many of these were located in East Anglia, given its proximity to mainland Europe and the presence of many Second World War airbases there. However, Upper Heyford was seen as an important strategic location due to its more westerly position which provided potential additional protection⁸.
- 3.7 Upper Heyford remained under the auspices of the RAF, but was rapidly improved and enlarged in readiness for bombers and refuelling aircraft. The first squadrons

⁵ [Former RAF Upper Heyford Conservation Plan \(ACTA, Oxford Archaeology & The Tourism Company; 2005\), CDK.3: *Ibid*, p.21; paragraph 2.6.2.](#)

⁶ [CDG.5: RAF Upper Heyford Conservation Area Appraisal, p.27.](#)

⁷ [CDK.3: Upper Heyford Conservation Plan *Ibid*, p.21, paragraph 2.6.4.](#)

⁸ [CDK.2: Cocroft, D. Former RAF Upper Heyford, Cherwell Oxfordshire: A reassessment of the flying field Conservation Area. p.4](#)

of KB-29P refuelling aircraft began to arrive at Upper Heyford from January 1952. The squadrons were on 90-day rotations. B-47 Stratojets and B-36 Peacemakers then began to use the base from 1953, prompting a change in the use of the airbase⁹. The airbase was frequently upgraded and improved during this period and one of the critical developments was the implementation of the Reaction Alert system, which was used to ensure that at least 20 aircraft could be airborne within 15 minutes of receiving a warning¹⁰.

3.8 The use of the airbase by the SAC also necessitated the construction of additional residential development to the south, in conjunction with improvements to the Flying Field. This period therefore represents a key phase of the airfield's development, with the stationing of the B-47 Stratojets, which had long-range bombing capabilities, instrumental in the deterrent policy pursued by the US.

3.9 The airbase was infrequently used for reconnaissance aircraft during this period and in 1965 was transferred from the SAC to the United States Airforce Europe. Following France's withdrawal from NATO and President de Gaulle's edict that American air forces could no longer be stationed in France, Upper Heyford became the base for 66th Tactical Reconnaissance Wing of the 4th Allied Tactical Force, prompting further upgrades and the construction of hangars for the Voodoo aircraft. It also continued to be used for bombers, including the large B52, necessitating the widening of the runways¹¹.

3.10 The 1970s saw the next key phase of development as the Cold War became increasingly "hot" and the threat of nuclear warfare increased. The early 1970s saw a major programme of improvement works, with three new squadrons of fighter jets based at Upper Heyford, leading to it becoming the largest fighter base in Europe. This included the stationing of F111 "Aardvark" fighters at Upper Heyford¹².

3.11 In the late 1970s, across the United Kingdom and Europe, the USAF undertook a process of "hardening" their bases in accordance with NATO strategy. This

⁹ CDK.2: *Ibid.* p.9.

¹⁰ CDK.3: *Upper Heyford Conservation Plan*, p.24; paragraph 2.8.4.

¹¹ CDK.3: *Ibid.* p.25; paragraph 2.8.6.

¹² CDK.3: *Ibid.* p.25; paragraph 2.8.7.

reflected the shift to a flexible response strategy and included the construction of new hangars, fuel stores and administrative buildings typically using steel frames and formers with thick concrete panelling to protect the buildings from attack and allow the launching of counter-strikes. This necessitated a major, and costly, programme of upgrades at Upper Heyford which gave the airbase much of its distinctive appearance and character still evident today¹³.

3.12 At RAF Upper Heyford this included the development of the 56 Hardened Aircraft Shelters across the airbase, including the grouping of seven shelters to the north of the Site which are relevant to this Appeal. The shelters are discussed further from paragraph 5.6, but were arranged in distinct clusters dispersed across the airfield with the hangars arranged in an apparently random pattern. This period also saw the construction of associated hardened maintenance and logistics buildings and the Quick Reaction Alert facilities. Together these structures, and the new operation of the airfield, was designed to enable around the clock rapid deployment to respond to any attacks from the Soviet Union. They structures were also dispersed across the airfield to minimise any potential damage that could be caused by a single bombing raid, allowing for a rapid counter-strike¹⁴. Some tree planting was also provided around the hardened aircraft shelters and on the fringes of the airfield, providing concealment, in part, to respond to local objections to the new developments at RAF Upper Heyford¹⁵. This planting has been allowed to mature during the following period and provides some screening of the Flying Field.

3.13 The cooling of tensions in the 1980s and into the 1990s following the fall of the Berlin Wall prompted a change in focus for Upper Heyford. The F111s stationed there were used in the First Gulf War and other missions, but the need for permanent airbases in Europe declined and the last F111 flew from RAF Upper Heyford on 7 December 1993¹⁶.

¹³ [CDK.2: Cocroft; reassessment, pp.29-30.](#)

¹⁴ [CDK.2: *Ibid.* p.8.](#)

¹⁵ [Cocroft, D. *Former RAF Upper Heyford, Cherwell Oxfordshire: A reassessment of the flying field Conservation Area* *ibid.* p.33](#)

¹⁶ [CDK.3: Upper Heyford Conservation Plan, p.26, paragraph 2.8.10.](#)

- 3.14 Following its military use, the Upper Heyford Working Group was established by Cherwell District Council to explore future uses for the airbase which could secure the conservation of the numerous heritage assets within it. This process included detailed assessment of the various heritage assets at RAF Upper Heyford to inform the redevelopment strategy and determine which structures should be retained, which could be demolished and where redevelopment would be best located.
- 3.15 Supplementary Planning Guidance was set out in 1995 for the temporary use of land and buildings at the airbase. Following this, the Structure Plan for Oxfordshire (adopted in 1998) allocated RAF Upper Heyford as the location of a new settlement of approximately 1,000 homes. The policy stated that the development would be provided “*as a means of enabling environmental improvements*” and that it should be undertaken in accordance with the comprehensive development brief. The development would also need to “*conserve important historic buildings and their settings, particularly those recommended for protection by English Heritage from the Cold War era*”.
- 3.16 At this time, the key objective was to use enabling development (a new settlement at the airfield) to repair the landscape which had been “*scarred by military intrusion*”¹⁷. This document was later withdrawn, but at this time the critical consideration was the extent of demolition and whether sufficient structures could be demolished to allow for landscape restoration and an enhanced environmental appearance.
- 3.17 An application for 1,000 houses, including the demolition of some structures and retention of others, was submitted in 2000. This was appealed for non-determination with a public inquiry held in 2002¹⁸. English Heritage provided written representations to the inquiry and undertook associated assessment work at this time. As part of this assessment process, English Heritage confirmed that they would recommend to the Secretary of State that the Nose Docking Sheds within the airbase (Buildings 325, 327 and 328) be listed. They also recommended that a number of the other structures be scheduled, with these designations made in 2008

¹⁷ [CDN.2](#): Cherwell DC, *RAF Upper Heyford Revised Comprehensive Planning Brief* (2007) Appendix C2.2

¹⁸ [The Appeal Decision is included at CDN.1.](#)

and 2006 respectively. English Heritage also requested that additional structures be retained within the flying field and that a comprehensive conservation management plan should be prepared. However, the Hardened Aircraft Shelters north of the Site were not identified as worthy of retention at this time.

3.18 The inquiry was dismissed and it is worth quoting the then Secretary of State's conclusions at length ([see CDN.1; paragraph 10.34](#)):

I consider that under the current proposal too many structures that are open to view and intrusive would remain. These include HASs and other Cold War structures in the main airfield, and a number of the industrial structures, such as buildings 293, 294 and 300, within the technical core area. Some of the Cold War structures on the airfield will now have to remain for heritage reasons, notwithstanding their prominence. However, I do not consider that enough of those structures towards the periphery of the base which are most prominent from the main viewpoints in the surrounding area are proposed for removal to reduce the degree of visual intrusion to a level that could be tolerated as part of a satisfactory permanent restoration of the site.

3.19 In effect, the Inspector and Secretary of State concluded that additional Cold War structures would need to be demolished to achieve the landscape and environmental improvements that were sought at the time. This illustrates that the primary heritage considerations were the retention of those structures proposed for designation, which are sited at the north and western parts of the flying field, together with an appropriate setting, rather than the large-scale structures to the fringes of the airfield.

3.20 On 30 November 2006, large parts of the airfield were scheduled as *Cold War structures at the former Upper Heyford Airbase*. The extent of the scheduled area is shown on CDK.4. On 7 April 2008, the following buildings at Upper Heyford (all of which lie outside of the scheduled area) were listed at Grade II:

- Former Squadron HQ Building (Building 234); NHLE 1392509
- Nose Dock Hangar at Former RAF Upper Heyford (Building 325); NHLE 1392505
- Nose Dock Hangar at Former RAF Upper Heyford (Building 327); NHLE 1392506

- Nose Dock Hangar at Former RAF Upper Heyford (Building 328); NHLE 1392507
- Control Tower (Building 340); NHLE 1392508

3.21 This reflects the often complementary approach taken by Historic England (and English Heritage before) for the designation of military structures. The listing selection guide also makes it clear that designation of military sites as conservation areas can offer the best way to ensure the special interest of the area as a whole, rather than just the buildings or monuments of greatest significance, is recognised and protected. At Upper Heyford, the scheduled areas relate both to individual buildings and the associated landscape, which includes the taxiways and aprons associated with the Hardened Aircraft Shelters to the north-west of the area (Buildings 3037, 3038, 3039, 3040, 3041, 3042, 3064).

3.22 Following this, and in light of the earlier Appeal decision, a revised Comprehensive Planning Brief was prepared by Cherwell District Council and formally adopted as supplementary planning guidance in 2007¹⁹.

3.23 The Comprehensive Planning Brief was informed by detailed studies undertaken by various parties to understand the heritage significance of the airfield and inform the conservation and redevelopment strategy. This included the RAF Upper Heyford Conservation Area Appraisal, which was produced in April 2006 when the Conservation Area was designated. The designation of the Conservation Area, closely followed by the designation of the scheduled monument and listed buildings at RAF Upper Heyford, changed the policy context for the heritage assets.

3.24 The Conservation Area Appraisal was informed by the Conservation Plan prepared in 2005, with both of these documents informing the production of the updated Comprehensive Planning Brief in 2007. Together these documents clearly established a conservation strategy for the Conservation Area, identifying which buildings, structures and areas were of highest significance and must be retained, which elements of setting should be retained and, where possible, enhanced, and which structures could be demolished. This document reflected the latest

¹⁹ See [CDN.2](#).

discussions between the North Oxfordshire Consortium, CDC and English Heritage and the recent scheduling of parts of the airfield. At this time, the strategy was to retain those structures within the scheduled areas, within an appropriate setting, while other buildings and structures could be demolished to provide environmental improvements²⁰. This included the demolition of the Hardened Aircraft Shelters to the north of the Site (relevant to this Appeal) which were identified on Figure 7 of the document (Environmental Improvements) as “*Buildings of national significance to be demolished, footprint retained*”²¹. This was based on the earlier assessment work which is summarised at page 47 of the Planning Brief.

3.25 The explanatory text at pages 45-46 clarifies that the Hardened Aircraft Shelters are of national significance and sit within an area of local/regional significance. The text goes on to state that:

Whilst buildings 3036, 3037, 3038, 3039, 3040, 3041, 3042 (HASs) in Area 6 are buildings of national interest, they are set within landscape of local / regional significance; they are visually divorced from the main groups of HASs and do not contribute to the special atmosphere; in this respect they differ from the nationally significant HASs in Area 5B2 in that they do not contribute to the setting of the Core Area of Historic Landscape; once the settlement is built they will be functionally split from the other HASs; they represent 79th squadron and their demolition would leave the other squadron groups unaffected; they are in close proximity to Chilgrove Drive, which is to be re-opened as public right of way, and several other existing public rights of way to the east of the site; several of them are highly visible when approaching the site from the B430. It is therefore proposed that these 7 HASs and their associated squadron HQ buildings should be demolished and their building footprint retained. English Heritage has accepted this proposal.

3.26 The Hardened Aircraft Shelters were therefore considered to be divorced from the wider airfield and not of sufficient significance to warrant retention.

²⁰ [CDN.2: Comprehensive Planning Brief, Section 3, p1; paragraph 3.1.1.](#)

²¹ [CDN.2: Ibid.](#) p.39; Figure 7 and associated text at paragraph B4.5.1.

- 3.27 RAF Upper Heyford was subject to an outline planning application (and subsequent appeal) and associated conservation area consent applications for its redevelopment in 2008-2009 (08/00716/OUT). This included the development of a new settlement to provide approximately 1,075 new dwellings, with most residential development sited north and south of Camp Road. A new community centre, with school and associated facilities, would also be provided on Camp Road. The Flying Field was subject to some demolition and re-use of existing buildings to provide vehicle preparation and car processing, with associated infrastructure works.
- 3.28 The original planning application was for the demolition of the seven Hardened Aircraft Shelters to the north of the Site which are relevant to the current Appeal. However, this was later amended following an objection from English Heritage to their demolition, with the revised proposals to retain all seven Shelters²². During the Appeal, consideration was given to the matter of whether the demolition of the Shelters, as proposed in the Comprehensive Planning Brief, was necessary to provide environmental benefits, chiefly potential improvements to views from the south.
- 3.29 At paragraph 19.62, the Inspector concluded that the Hardened Aircraft Shelters are currently experienced as part of a “*transitory view*” on approach along Camp Road from the east. The Inspector went on to state that the Shelters have always co-existed with housing and that their demolition was not required to create a “*satisfactory living environment*”. Furthermore, the views of the Shelters, to the extent that they may be seen as undesirable, could be screened by planting along Chilgrove Drive. The Inspector did not, therefore consider that the demolition of the structures was necessary or desirable to achieve the environmental benefits sought by the scheme and would not deliver “*substantial benefits*” that would outweigh the harm to the significance of the Conservation Area caused by their loss.
- 3.30 A further application was submitted by Dorchester Living in 2010 for a similar development (10/01642/OUT), comprising a new settlement of 1,075 dwellings including the retention and change of use of 267 existing military dwellings to residential Class C3 and the change of use of other specified buildings, together

²² See CDN.4: p.7: paragraph 2.8.

with associated works and facilities. This application was a replacement scheme for the Lead Appeal (related to application 08/00716/OUT and discussed above), but related only to the New Settlement Area and not the Flying Field.

3.31 English Heritage commented that the revised proposals provided heritage benefits when compared with the previously approved development, primarily due to the reduced extent of demolition, allowing for additional heritage assets to be retained and conserved²³. This planning permission is currently being built out through various reserved matters applications. This has included the retention and conversion of existing buildings and the demolition of a number of structures to provide new homes and community facilities, although the street pattern established by the airbase has largely been retained. The demolition of some large-scale structures and their replacement with housing has created a finer grain to the character of development within the residential and technical parts of the Conservation Area. The Flying Field remains essentially unchanged from its Cold War form, though its setting has been changed by additional residential development, including new residential development within the Technical Area, within the wider Conservation Area.

3.32 A further application was submitted in 2018 by Dorchester Living from the construction of 1,175 new dwellings and associated infrastructure and facilities (18/00825/HYBRID) which proposed new uses within the Flying Field²⁴. This includes a proposal to convert the existing Hardened Aircraft Shelters to the north of the Site to form part of a creative employment cluster, with associated extensions and new build. This would include the change of use of the Hardened Aircraft Shelters, new build around the periphery of this area and the construction of a new heat and power plant south of the shelters with an exhaust stack up to 24m tall²⁵. This part of the development is proposed in outline at this stage, with the indicative masterplan showing the extension of the Hardened Aircraft Shelters to provide

²³ [CDN.9: Dorchester Committee Report, paragraph 7.32.](#)

²⁴ [See CDN.5 and CDN.6 for the approved parameters plans.](#)

²⁵ Pegasus Heritage Statement (2018) paragraph 6.14

significantly larger footprints as part of the Creative City²⁶. New housing is also shown to the immediate west and south-west of the buildings, with a larger area of development (Parcel Z6) located to the east of the shelters between them and the Bomb Store, with some structures within the Bomb Store demolished. The proposals also allow for a potential vehicle link from the southern Shelter, providing a physical link with the landscape beyond and the removal of some planting.

3.33 Historic England objected to the application and raised concerns regarding the height of the development surrounding the Shelters and the introduction of new housing within the Flying Field area²⁷. Cherwell's Heritage Officer also raised concerns²⁸. The Committee Report concluded that, while the proposals would result in a moderate-high level of less than substantial harm to the significance of the Conservation Area, this would be outweighed by public benefits. The application was subsequently approved²⁹. The principle of residential development within the Flying Field has therefore been accepted and will change the character of the Flying Field and the Conservation Area when developed.

3.34 It is evident that, should the approved proposals be built out, there will be a notable change to the Hardened Aircraft Shelters, their immediate setting and their relationship with the wider airfield and the land beyond. Although the central apron, space between the buildings and link to the taxiway will be retained, new residential development will be introduced to the immediate east and west, with commercial development to the south. The provision of large-scale extensions to the buildings and new development of up to 18m in height will also diminish their architectural interest and the ability to view them from the Site, with the shelters closest to the Site seeing significant alteration and extension³⁰.

²⁶ See CDN.5, CDN.6 and CDN.7, p.

²⁷ CDN.8, Officer's Report; paragraph 7.21.

²⁸ CDN.8; paragraph 7.15.

²⁹ CDN.8; paragraph 9.140.

³⁰ CDN.7: Pegasus Design and Access Statement (202048), p.64 and p.92p-90.

3.35 Planning permission has also been granted for residential development within the Conservation Area's setting, on land immediately west of the Site (15/01357/F)³¹. A recent application for 126 dwellings on this land (22/03063/F) has been considered by the Council's Heritage Officer who concluded that it would cause no harm to the significance of surrounding heritage assets (see Appendix E). This demonstrates that the principle of additional residential development within the setting of the Conservation Area has also been accepted.

3.36 The above summary demonstrates that RAF Upper Heyford has developed and evolved through key, distinctive stages. This has included:

- The First World War Flying Field
- The upgrade and development of the airbase as a training base in the Second World War
- The evolution of the airfield as a Cold War base
- The "hardening" of the base in the 1970s and 1980s
- The decommissioning of the base and its promotion for mixed-uses
- The redevelopment of the residential and technical areas to create a new community with additional dwellings
- The next stage will include the redevelopment of the Flying Field to introduce new commercial and residential uses

³¹ See [CDN.13](#) and [CDN.14](#).

4 RELEVANT LEGISLATION, POLICY AND GUIDANCE

4.1 The following legislation, policy and guidance is directly relevant to this Proof of Evidence.

Planning (Listed Buildings and Conservation Areas) Act 1990

4.2 Section 66 of the Act states:

In considering whether to grant planning permission [F152or permission in principle] 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 or historic interest which it possesses.

4.3 Section 69 of the Act states:

(1) Every local planning authority—

(a) shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and

(b) shall designate those areas as conservation areas.

(2) It shall be the duty of a local planning authority from time to time to review the past exercise of functions under this section and to determine whether any parts or any further parts of their area should be designated as conservation areas; and, if they so determine, they shall designate those parts accordingly.

4.4 72 of the Act states:

(1) In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of] any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

National Planning Policy Framework (Ministry of Housing, Communities and Local Government, September 2023)

- 4.5 The NPPF defines a heritage asset as a: *'building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest'*. This includes both designated and non-designated heritage assets.
- 4.6 Section 16: Conserving and Enhancing the Historic Environment relates to the conservation of heritage assets in the production of local plans and decision taking. It emphasises that heritage assets are *'an irreplaceable resource, and should be conserved in a manner appropriate to their significance'*.
- 4.7 For proposals that have the potential to affect the significance of a heritage asset, paragraph 194 requires applicants to identify and describe the significance of any heritage assets that may be affected, including any contribution made by their setting. The level of detail provided should be proportionate to the significance of the heritage assets affected. This is supported by paragraph 195, which requires LPAs to take this assessment into account when considering applications. Cherwell District Council did not raise any concerns with the methodology or content of the submitted BHS, which addressed the requirement of paragraph 194 of the NPPF.
- 4.8 Under *'Considering potential impacts'* paragraph 199 states that *'great weight'* should be given to the conservation of designated heritage assets, irrespective of whether any potential impact equates to total loss, substantial harm or less than substantial harm to the significance of the heritage assets.
- 4.9 Paragraph 201 states that where a development will result in substantial harm to, or total loss of, the significance of a designated heritage asset, permission should be refused, unless this harm is necessary to achieve substantial public benefits, or a number of criteria are met. Where less than substantial harm is identified paragraph 202 requires this harm to be weighed against the public benefits of the proposed development.
- 4.10 Paragraph 203 states that in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

4.11 Paragraph 206 states that local planning authorities should look for opportunities for new development within the setting of heritage assets, to enhance or better reveal their significance and that proposals that better reveal the significance of an asset should be treated favourably.

Planning Practice Guidance (DCLG)

4.12 The PPG defines the different heritage interests as follows:

- archaeological interest: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
- historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

GPA2: Managing Significance in Decision-Taking in the Historic Environment (March 2015) CDK.5

4.13 This document provides advice on decision making in the historic environment and how this can be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to that significance. In line with the NPPF and PPG, the document states that early engagement and expert advice in considering and assessing the

significance of heritage assets is encouraged. The advice suggests a structured, staged approach to the assembly and analysis of relevant information:

1. Understand the significance of the affected assets;
2. Understand the impact of the proposal on that significance;
3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
4. Look for opportunities to better reveal or enhance significance;
5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance balanced with the need for change; and
6. Offset negative impacts to significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

GPA3: The Setting of Heritage Assets (Second Edition; December 2017) (CDK.1)

- 4.14 This advice note focuses on the management of change within the setting of heritage assets, to aid practitioners with the implementation of national legislation, policies and guidance relating to the setting of heritage assets found in the 1990 Act, the NPPF and PPG.
- 4.15 As with the NPPF the document defines setting as *'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve'*. Setting is also described as being a separate term to curtilage, character and context. The guidance emphasises that setting is not a heritage asset, nor a heritage designation, and that its importance lies in what it contributes to the significance of the heritage asset, or the ability to appreciate that significance. It also states that elements of setting may make a positive, negative or neutral contribution to the significance of the heritage asset.
- 4.16 The document states that the extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from

other land uses in the vicinity, and by our understanding of the historic relationship between places.

- 4.17 This document provides guidance on practical and proportionate decision making with regards to the management of change within the setting of heritage assets. It is stated that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, further weighing up the potential public benefits associated with the proposals. It is further stated that changes within the setting of a heritage asset may have positive or neutral effects.
- 4.18 Positive changes may include the restoration of historic features or views, the removal of negative elements within the setting of a heritage asset, or the provision of public access and public views, aiding the interpretation and appreciation of the asset.
- 4.19 The document also states that the contribution made to the significance of heritage assets by their settings will vary depending on the nature of the heritage asset and its setting, and that different heritage assets may have different abilities to accommodate change without harming their significance. Setting should, therefore, be assessed on a case-by-case basis.
- 4.20 Historic England recommends using a series of detailed steps in order to assess the potential effects of a proposed development on significance of a heritage asset. The 5-step process is as follows:
1. Identify which heritage assets and their settings are affected;
 2. Assess the degree to which these settings and views make a contribution to the significance of a heritage asset(s) or allow significance to be appreciated;
 3. Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;
 4. Explore ways to maximise enhancement and avoid or minimise harm; and
 5. Make and document the decision and monitor outcomes.

The Cherwell Local Plan 2011 – 2031

Policy ESD 15: The Character of the Built and Historic Environment

Policy ESD 15 includes the following relevant extracts:

Successful design is founded upon an understanding and respect for an area's unique built, natural and cultural context. New development will be expected to complement and enhance the character of its context through sensitive siting, layout and high quality design. All new development will be required to meet high design standards. Where development is in the vicinity of any of the District's distinctive natural or historic assets, delivering high quality design that complements the asset will be essential.

New development proposals should:

- *Conserve, sustain and enhance designated and non designated 'heritage assets' (as defined in the NPPF) including buildings, features, archaeology, conservation areas and their settings, and ensure new development is sensitively sited and integrated in accordance with advice in the NPPF and NPPG. Proposals for development that affect non-designated heritage assets will be considered taking account of the scale of any harm or loss and the significance of the heritage asset as set out in the NPPF and NPPG. Regeneration proposals that make sensitive use of heritage assets, particularly where these bring redundant or under used buildings or areas, especially any on English Heritage's At Risk Register, into appropriate use will be encouraged*
- *Include information on heritage assets sufficient to assess the potential impact of the proposal on their significance. Where archaeological potential is identified this should include an appropriate desk based assessment and, where necessary, a field evaluation.*

4.21 The Local Plan also includes a site-specific policy for RAF Upper Heyford to deliver approximately 1600 new homes (in addition to the 761 dwellings already permitted), employment uses and infrastructure. This policy included a number of criteria to ensure the character of the conservation area, and the Flying Field in particular,

would be preserved and requires that new development respond to the characteristics of each of the areas within the airfield.

- 4.22 The council are currently consulting on a review of the Local Plan. This seeks the implementation of the approved masterplan for Heyford Park and seeks to allocate additional land to the south for residential purposes.

Mid Cherwell Neighbourhood Plan 2018-2031

- 4.23 The Neighbourhood plan was made in 2019 and includes the following relevant policy:

POLICY PD4: PROTECTION OF IMPORTANT VIEWS AND VISTAS

Development proposals within the plan area must demonstrate sensitivity to the important views and vistas described in Table 4 and illustrated by photographs in the documents referred to in that Table, by including an assessment of the significance of the views and the effect of the proposed development on them. Proposals which cause significant harm to any of these views will only be acceptable where the benefits of the proposal clearly outweigh any harm.

Development proposals must also be designed such that there is no adverse impact on the sensitive skylines identified in Fig. 8 and referenced in Table 4.

Applicants for development in or adjacent to a Conservation Area must demonstrate in a Heritage Impact Assessment that they have taken account of the appropriate Conservation Area Appraisal, and of the Heritage and Character Assessment at Appendix K, and demonstrated that the proposal causes as little harm to an identified view as possible and that any harm is outweighed by the benefits of the proposal. The development should not harm the Conservation Area and its setting, other heritage assets, or historic street and village views and longer distance vistas.

5 HERITAGE ASSESSMENT

- 5.1 The following section provides an assessment of the significance of the relevant heritage assets set out at paragraph 2.3 and the impacts to this significance arising from the development proposals. This is undertaken in accordance with the “5-step” process set out in *GPA3: The Setting of Heritage Assets* (see paragraph 4.20 for more information).
- 5.2 The reason for refusal cited harm *to the setting of designated heritage assets* with only the RAF Upper Heyford Conservation Area identified in the reason for refusal. It is therefore considered that the Conservation Area is the only designated heritage asset relevant to this appeal. For the reasons set out at paragraph 2.2, consideration is also given to the Hardened Aircraft Shelters and Southern Bomb Stores.
- 5.3 The Upper Heyford Conservation Area is a large conservation area which contains a range of designated and non-designated heritage assets (including the Hardened Aircraft Shelters and Bomb Stores identified above). In accordance with section 72 of the Act and paragraph 207 of the NPPF, it is necessary to understand the impacts to the significance of the conservation area as a whole, given it comprises a single designated heritage asset. However, separately assessment must also be given to the impacts to the significance of the relevant non-designated heritage assets. This section follows the 5-step process provided in GPA3, but is structured to first describe the relevant non-designated heritage assets and assess their significance, before providing a description of the wider Conservation Area and its significance, cognisant of the contribution made by the designated and non-designated heritage assets within it.
- 5.4 The non-designated heritage assets form part of the conservation area (with the wider conservation area and some land beyond consequently forming their settings). There is consequently a significant degree of overlap between the setting of the relevant heritage assets. Therefore, while they are discussed separately below, this overlap should be recognised.

Hardened Aircraft Shelters

Step 1: Identify which heritage assets and their settings are affected

- 5.5 The Hardened Aircraft Shelters comprise a group of seven shelters that date from the hardening programme undertaken at the end of the 1970s. The structures are located within the Flying Field area of the RAF Upper Heyford Conservation Area, to the south of the main runway. The south-western shelter is located approximately 30m north-east of the Site's northern boundary. They have been identified by Cherwell Council as non-designated heritage assets and Figure 19 of the Conservation Area Appraisal identifies them as *Non Listed Buildings of Local Significance*, although other documents including the Comprehensive Development Brief, describe them as being of national importance/significance. Given their role as part of the hardening of the airbase, they are considered within this Proof of Evidence to be of national significance.
- 5.6 The 1970s saw a shift in strategy from "mutually assured destruction" to "flexible response" with the need to protect aircraft and facilities at the various NATO bases and allow for a rapid counter-attack, amongst other measures that would utilise both conventional and chemical weaponry. NATO's strategy was to provide hardened shelters for 70% of frontline tactical aircraft, with funding provided for these new facilities, while any additional shelters would be funded by individual governments. A series of criteria also had to be met to ensure NATO funding.
- 5.7 At Heyford, this strategic shift led to a significant change to the base with elements of the Second World War and early Cold War airbase stripped away to allow for the construction of 56 hardened aircraft shelters and other hardened facilities, such as the avionics centre and associated fuelling facilities. The hardened strategy was particularly important in relation to the F-111s, which were a critical part of the deterrent strategy due to their medium-range capabilities, while also being complex to maintain and operate. This meant that dispersal of the planes across various airfields was not possible and instead various hardened shelters and related operating facilities were constructed at Heyford to protect and maintain the aircraft.
- 5.8 The hardened shelters were constructed in distinct groups, with the majority to the north of the runway (which includes nine within the scheduled area) and two

groupings to the south, one at the western end of the runway and one to the east (the grouping relevant to this Appeal). The changed operation of the airfield also required the construction of various taxiways and aprons to connect the shelters, avionics buildings and runway. In addition, a long taxiway was constructed to the north of the existing runway which could serve as an emergency runway in the case of the principal one being damaged in an attack.

- 5.9 Cocroft provides a detailed description of the shelters at Upper Heyford³² which is included below:

The Hardened Aircraft Shelters at Upper Heyford are all of the third generation type with steel-framed, reinforced concrete sliding doors (Figure 15). Each is of standard design with a semi-circular cross-section measuring 120ft (36m) in length, 71ft (21m) wide and 28ft (8m) high. Internally, they are formed of curving, pressed steel panels to prevent concrete spalling in the event of an attack. To the rear were a set of sliding steel doors that could be opened to permit the aircraft engines to be started up under cover. During trials this design was shown to be most effective form to resist blast from conventional weapons and during tests of a simulated nuclear explosion. The pressed steel sheets are covered by 2ft (60cm) of reinforced concrete (Figure 16). Each shelter cost \$500,000, which was a fraction of the \$13 million price of a single F-111 (DEFE 71/301, E53). A minor variation is found in the design of the rear efflux deflectors, ones constructed by John Laing and Son Ltd have a simple deflector, while those built by Richard Costain Ltd exhibit winglike projections; the significance of the difference is unknown. One shelter in each squadron area was also provided with a decontamination unit, shelters 3014, 3026, 3041 and 3043.

- 5.10 The placing of the shelters was dictated by the need to provide random patterns, with no more than three in a direct line over 500m, avoiding the risk of all, or most, of the shelters being wiped out in a single bombing run.
- 5.11 The significance of the structures lies in their historic interest as surviving examples of the hardened phase of Upper Heyford's development, which exemplifies a shift

³² Cocroft, W. *reassessment of the flying field* p.22

in military strategy. They provide a tangible link to the Cold War era and a physical reminder of the fear that became part of everyday life. The structures also possess architectural interest, with their form directly related to their particular function and they illustrate the evolving technologies that allowed for the construction of well-protected aircraft shelters.

- 5.12 The shelters represent the most common building type at Upper Heyford and are dispersed across the airfield in distinct groupings. These groupings, with the structures often seen alongside one another, adds additional historic interest and provides an understanding of the historic function of the airbase in the 1970s and 1980s. The architectural interest of the structures is linked to their deliberate, functional design which includes their inter-relationship and relationship with the wider Flying Field, rather than any particular artistic or aesthetic interest. Indeed, the Council have previously identified them as being visually intrusive (for example in evidence at the 2010 Appeal). However, their muted colour palette which aided camouflage and the general bulk of the structures, which contrast strongly with the surrounding landscape outside of the airfield, reinforces their historic role.
- 5.13 The function of these shelters slightly differed from the grouping to the south-west, which was designated as part of the Quick Reaction Alert facility, with this part of the Flying Field (which is included within the western scheduled area) including a range of integrated facilities and structures designed to provide a rapid counter-strike in the event of attack. These structures are also well integrated within the airfield and closely relate to neighbouring clusters of shelters and the runways and taxiways.
- 5.14 In contrast, the seven to the north of the Site are more isolated and not well-related to, or highly visible from, much of the surrounding airfield. This means that, while they are identical in design to the other hardened aircraft shelters within the airfield, they have not been designated and have consistently been viewed as of lower significance. This is reflected first by the proposed demolition of the structures in the Development Brief and, more recently, the acceptance of their redevelopment which would include significant new development within their immediate settings.
- 5.15 The setting of the seven shelters to the south-east includes three principal elements: their group value and relationship with one another; their relationship with the wider airbase and facilities; and their relationship with the landscape beyond,

which includes the Site. These elements, and the contribution that they make to the significance of the shelters as non-designated heritage assets, are discussed further below.

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

- 5.16 The group value and inter-relationship between the shelters which form this grouping of seven is an important element of their significance. The shelters were constructed to identical designs at the same time as one another and represent a distinct and key phase of Upper Heyford's development. The shelters were constructed to the south of the bottom part of the original "A" runway from the Second World War, but were linked by a new, shared apron and additional taxiways to the east, illustrating the upgrades to the airfield as part of the hardening phase. The hangars appear to be placed in a random pattern, which was dictated by the need to stagger their alignment, while still allowing them easy access to the large shared apron. This reflects their strategic role and provides additional historic interest.
- 5.17 The hangars were seven of 56 originally built across the airfield, along with the other hardened structures such as the Avionics Building and hardened Wing Headquarters building. Together these buildings clearly represent the change in wider military strategy and the principal phase of development at Upper Heyford that is now visible. Much of our current experience of the airbase is dictated by this stage of development, with elements of the earlier airfield either lost or obscured by the later Cold War development. The functional association between the various elements therefore strongly relates to the historic interest and overall significance of the Hardened Aircraft Shelters.
- 5.18 The setting of the Shelters beyond the Flying Field includes residential and commercial development associated with the airfield (located within the conservation area), modern residential development within the conservation area, residential development outside of the conservation area and the surrounding landscape. This section focuses on the contribution these elements of setting make to the significance of the Shelters, with their contribution to the significance of the wider conservation area discussed below.

- 5.19 The residential development within the conservation area now comprises a mixture of historic development, linked to the inter-war, Second World War and Cold War phases of the airbase's development, together with recent development undertaken as part of the redevelopment of the airbase to provide a new community. The earlier development, including the Officer's housing and Second World War housing constructed by the RAF, pre-dated the Cold War Structures and makes a limited contribution to their historic interest, and significance. It demonstrates the presence of an earlier airfield but makes no contribution beyond this. The Cold War development, which includes small-scale housing for American airmen, provides historic context and contributes to the significance of the buildings, although this is limited by the distance from many of the dwellings which are not experienced alongside the shelters.
- 5.20 The modern development follows the broad parameters established by the historic airbase and reflects the combination of residential and military uses that has always existed at RAF Upper Heyford. However, it makes no contribution to the historic, or architectural interest of the structures, or to their significance. This development does illustrate the historic and ongoing development of the airfield for other uses, with further residential development recently approved. The Shelters are therefore experienced within a changed setting and one that is capable of absorbing additional change, without diminishing the ability to understand the historic function and interest of the structures.
- 5.21 The wider landscape is typically rural and agricultural in character, which much of it is in arable use. This reflects the historic land uses, with the 1841 Middleton Tithe map and related apportionments (not reproduced here) identifying the majority of the land that now comprises the airfields and its surroundings as arable or woodland. There is a clear contrast in character between the airfield, which is generally open and includes numerous large-scale structures, and the surrounding agricultural land which retains an agricultural character with smaller scale field parcels. Although there has been some loss of historic hedgerows and field amalgamation through the 20th century, it still retains a distinctive historic landscape character which is completely different to the military landscape of RAF Upper Heyford. This distinction is reinforced by the security fencing that bounds the Flying Field and the now well-established boundary planting. It has also been established,

for example by the Inspector at the 2010 Appeal, that further planting here would not be inappropriate and could be used to further reinforce the distinction between the military landscape of the airfield and the agricultural and residential land beyond. Indeed, this process was undertaken from the 1980s to provide enclosure and screen views of the developing hardened landscape from local residents.

- 5.22 The Site is effectively divided into three distinct areas, comprising the large, roughly rectangular field which lies north of Camp Road and west of Chillington Drive, the narrow strip of land to the west which includes the existing ponds, and the triangular field to the north. Views of the shelters are permitted from within the eastern field and the northern field of the Site, with the structures seen looming over the dividing fence and treeline. The Conservation Area Appraisal does not identify any views from the Conservation Area directly overlooking the Site (see Figures 9-11 of CDG.5) from the Hardened Shelters or their near surrounds. Any views are limited by the intervening planting and the security fencing, although the Site does assist in reinforcing the clear transition between the military landscape and the agricultural land beyond.
- 5.23 These views are partial and are focused on the southerly structures, particularly Buildings 3038, 3039 and 3040, with the roof and upper elements of the structures seen rising above the intervening planting (see Plates 2, 3 and 4). The distinctive form, including roof shape, of these structures means that they are immediately recognisable as aircraft hangars, while their exterior materials are also visible. Their precise construction, as part of the hardened phase of building, is not as easily understood with the internal metal formers which are a distinctive feature of the hardened structures not recognisable. The historic and technological interest of the buildings are not therefore appreciated from the Site, while there is only a limited appreciation of their group value, with most obscured from view. It is also not possible to appreciate their relationship with the wider airfield, neighbouring taxiways or the related structures such as the Avionics Building. The partial experience of the structures from within the Site does not, therefore provide an understanding of their strategic function or their role as part of the shift to a new military strategy.
- 5.24 On completion of the hybrid development, including the construction of the Creative City, the form of the shelters would be significantly changed with new development

of up to 18m introduced adjoining and within the setting of these Shelters, including on land to the south (sitting between the Shelters and the Site). This would diminish the ability to experience the Shelters from within the Site and the ability to appreciate their significance would likely be severely diminished given the scale of alteration and proposed new development which would sit between the Shelters and the Site.

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it

- 5.25 The proposals will alter views of the Shelters from both the eastern and northern field parcels within the Site. The scale of the shelters means that numerous views, even if reduced, will still be permitted from within the Site from both the areas of open space and between proposed built form (subject to detailed design). Views of the development from the Shelters and their close settings would be screened and heavily filtered by the intervening existing and proposed planting.
- 5.26 The historic interest of the structures, which includes their former uses, group value and association with other structures within the airfield, will not be diminished. This is also not currently appreciable from within the Site and therefore any changes will not affect the ability to experience and appreciate this group value and the related historic interest. There will be a change in character within the Site, related to the change in land use and residential development. However, a clear contrast between the flying field and the Site will be retained, while the development will include open space and landscaping to provide a demarcation between the “hard” landscape of the airfield and the landscaped land to the south. This will allow the hardened aircraft shelters to still be experienced within the military landscape setting closely related to their historic use. This is consistent with the historic development of the base, which has always featured residential development located close to, but separated from, the military functions and typically focused to the south of the Flying Field. Furthermore, Historic England, when commenting on the neighbouring development to the west (under application 15/01357/F) noted that development within the land to the south would have far less impact on residential development within the Flying Field itself. This approach therefore allows for the delivery of new

housing, while retaining the core significance, character and appearance of the Flying Field and the listed and non-listed structures within it.

- 5.27 The character of the Shelter's settings, which includes a mixture of military uses to the north, east and west, and residential and agricultural uses to the south (separated by security fencing) will be unchanged. The proposals will not therefore diminish the architectural or historic interest of the structures, or the ability to appreciate this. Their significance, as non-designated heritage assets will be unchanged, with the proposals having no impact on this significance.

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

- 5.28 No harm has been identified to the significance of the non-designated heritage assets and no further mitigation measures are considered necessary. This is consistent with the reason for refusal, which does not identify any harm to any non-designated heritage assets, while the Council's Conservation Officer did also not identify any harm to the significance of the Shelters or state that paragraph 203 was engaged. However, it should be noted that the current proposals are in outline only and future reserved matters applications will therefore provide the opportunity for further consideration of the layout, materials and scale of development within the Site.

- 5.29 Future applications would allow for lower height and density development to the northern extents of the development parcels which will allow views of the Shelters to be retained and potentially offer a looser grain of development in these areas, which will respond to their apparently random layout and the looser grain of the farmstead to the west. This will ensure that the proposals respond to their immediate context, including the heritage assets to the north and the proposed development to the west.

Step 5: Make and document the decision and monitor outcomes

- 5.30 The proposals will conserve the significance of the hardened aircraft shelters as non-designated heritage assets. The proposals comply with Policy ESD15 and the relevant provisions of the NPPF. There is no harm to the significance of the Hardened Aircraft Shelters as non-designated heritage assets and, as noted by the Conservation Officer in their representation, paragraph 203 is not engaged.

Southern Bomb Stores

Step 1: Identify which heritage assets and their settings are affected

- 5.31 The Southern Bomb Stores were constructed in the 1950s, before undergoing alterations as part of the wider hardening strategy in the 1970s. They were originally constructed along four parallel roads to the south of the eastern end of the runway and included a total of 20 open storage bays with earthwork banks. In the 1970s 27 storage “igloos” were constructed in the southern part of this storage area, accessed from the roads. They were completed in 1978. A further 24 were constructed to the north in the 1980s removing all of the earlier open storage bays. They are all similar in size and design, with some minor differences, but all are trapezoidal in shape and linked by the roads.
- 5.32 The stores are further evidence of the hardening programme of the 1970s and 1980s, but the structures themselves are of limited significance. They appear to have been used for conventional weapons, in contrast with the more specialised stores to the north, which are included in the scheduled area. The stores do, however, retain historic interest and provide an insight into the operation and evolution of the airfield.
- 5.33 They are set at the south-east extremity of the airfield and are distant from the majority of the structures. Their profile and form mean that they are not highly visible from the surrounding airfield or landscape and they have a limited presence as a result. They are not visible from within, or across, the Site. No important return views from the Bomb Stores are noted in the Conservation Area Appraisal and the Stores are well separated by the intervening planting and development, which includes the Hardened Aircraft Shelters discussed above.

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

- 5.34 The setting of the individual structures is reliant on their close physical relationship with one another and the surrounding roads network which gave access to them. They are separate from much of the airfield, to provide some protection, but are not highly visible from within it due to their scale. Where visible, they are experienced

as a series of simple, repeated structures largely covered in earth, presumably to provide camouflage from the air, as an additional layer of defence.

5.35 The Site does not provide any appreciation of the Southern Stores, their historic function or their significance and makes no contribution to their significance.

5.36 The development approved under the hybrid application also includes the demolition of the western-most stores and the construction of residential development on this land and the land to the west, which sits between them and the Hardened Aircraft Shelters. This would reduce the group value that the bomb stores share and diminish the overall significance of the non-designated heritage asset. The residential development will also further separate the stores from the Site.

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it

5.37 The proposals will not affect any views to or from the Bomb Stores and will not diminish or affect the ability to appreciate their historic form, function or relationship with the wider airbase. The development will have no impact on their significance.

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

5.38 The separation between the stores and the Site, coupled with the lack of appreciation of them from within the Site, means that no harm will be caused to their significance. No mitigation measures are necessary and further design amendments to respond to their setting, or significance, is also not necessary.

Step 5: Make and document the decision and monitor outcomes

5.39 The proposals will conserve the significance of the hardened aircraft shelters as non-designated heritage assets. The proposals comply with Policy ESD15. and the relevant provisions of the NPPF. There is no harm to the significance of the Bomb Stores as non-designated heritage assets and, as noted by the Conservation Officer in their representation, paragraph 203 is not engaged.

RAF Upper Heyford Conservation Area

Step 1: Identify which heritage assets and their settings are affected

- 5.40 The Conservation Area extends to approximately 505 hectares (Conservation Appraisal; p.5). This section provides a general description of the Conservation Area, with the relevant heritage assets described in more detail above. The Conservation Area includes the Flying Field (which is itself divided into distinct character areas), the Technical Site and the Residential Area, most of which is located south of Camp Road. As discussed at Section 3 above, the airfield developed across four key phases, firstly as a First World War airfield, then as a Second World War airfield, subsequently as a Cold War SAC base and finally as a “hardened” airfield during the Cold War when the strategy changed from one of mutually assured destruction to one of flexible response. These phases are still evident in the different building typologies within the Conservation Area.
- 5.41 In essence, the significance of the Conservation Area derives from its survival as one of the best preserved Cold War airfield landscapes for fast jets. The different building typologies and phases also illustrate the ongoing changes to military strategy and the need to constantly upgrade the structures and layout of the airfield to support these. The individual buildings, structures and elements of hard landscaping (such as the aprons, taxiways and runways) are of individual significance, but this significance is notably heightened by their interaction with one another. As Cocroft states: *[t]he significance of Upper Heyford lies in the survival of the airfield landscape comprising many individual structures, whose importance is amplified by their interconnectivity with one another*³³. The historic interest of the airbase can only be truly understood through understanding the relationship between the individual buildings and the landscape within the airfield. This provides a clear insight into the operation of the airfield and the relationship between the different component parts. The Conservation Area Appraisal also states (see p.22) that *“[t]he prominent hardened aircraft buildings, the enclosure fences around operational areas, the planned layout of the functionally related groups of buildings*

³³ *Ibid.* p.35

and the spaces in between, together with 'campus' nature of the site all contribute significantly to the 'Cold War' character of the site".

5.42 The Conservation Area therefore possesses a high level of historic interest, which is demonstrated by the range and number of designated heritage assets within it, as well as architectural interest, derived particularly from the function and innovative technology used within the design and construction of the airbase. In this case, the architectural interest is strongly linked to the function of the structures and their relationship with one another, rather than any particular aesthetic qualities. However, the scale and historic use of some structures, such as the Hardened Aircraft Shelters does strike awe in the viewer and provides additional architectural interest.

5.43 The Conservation Area is divided into distinct areas within the Conservation Area Appraisal, with these further subdivided into sub-areas. This includes:

- The Flying Field: the main part of the airbase which includes the runways, taxiways, aprons and various aircraft shelters and technical buildings associated with their maintenance, together with the bomb stores and fuel stores
- The Technical Site: which was largely developed by the RAF during the Second World War
- The Residential Area: which included housing for servicemen and their families

5.44 The residential and technical areas have a completely different character to the Flying Field owing to the greater sense of enclosure and, in general, the smaller scale of built development. The Site lies to the immediate south of the southern part of the Flying Field and to the east of the residential area, albeit separated by the neighbouring field parcel which has planning permission for residential development. This section focuses primarily on the Flying Field as a result.

5.45 The significance of the Flying Field is particularly drawn from its survival as an intact and particularly well-preserved example of a Cold War "hardened" airfield, with the various structures, taxiways, runways and landscaping all illustrating this historic use. The current character and appearance of the Flying Field is almost wholly formed by this period of development. However, the character of the Conservation Area and its significance does vary across the Flying Field, with the

most important elements designated as part of the scheduled monument, which includes the Victor Alert (or Quick Reaction Alert) complex to the north-west and the Special Weapons Area, which was likely used to house nuclear weapons. The Conservation Area also includes the grouping of listed Nose Docking Shelters, the Control Tower and the Former Squadron HQ. The significance of these component parts is closely related to their historic use, but also their close physical and, formerly, functional relationship with one another which allows these uses to still be appreciated today.

- 5.46 In contrast, the Hardened Aircraft Shelters to the north of the Site are somewhat isolated and separated from much of the wider airfield infrastructure, as clarified within the Planning Brief. This means that, while the Shelters themselves are identified as being of national significance, this part of the Conservation Area is identified as local/regional³⁴. This contrasts with much of the wider Flying Field, with the runways and taxiways to the north identified as being of National Significance, while the Hardened Aircraft Shelters to the north-west are of Regional Significance. The Bomb Stores and wider land to the north-east are also identified as being of Local Significance, again reflecting how the more peripheral nature of the eastern and south-eastern parts of the Conservation Area, which are not experienced as being closely related to the wider Flying Field, are of lesser significance.
- 5.47 The hybrid application, which includes additional residential development, would further fragment the Flying Field and reduce the ability to appreciate the historic and functional relationships between the different component parts of the Flying Field.
- 5.48 The Technical Area included a fan of three roads to the north of Camp Road, with larger scale buildings set either side the tree-lined streets. This area provided functions related to the Flying Field to the north and a mixture of Second World War and post-war buildings. Much of the area is currently being redeveloped to provide additional dwellings.

³⁴ Cherwell District Council, *RAF Upper Heyford Revised Comprehensive Planning Brief 2007*, P. 138, Figure 18.

5.49 Much of the housing within the Residential Area of the Conservation Area was constructed to simple, standardised designs with bungalows for the airmen provided to the south of Camp Road along a variety of streets. This area, which is currently being redeveloped to provide new housing, has an unusual street pattern, with two diamonds of development surrounding greens and a number of smaller roads. It has a suburban character. A denser development of bungalows was provided to the north-east on land due west of the Site and west of what is now Trenchard Circle. To the south of this, larger houses which provided accommodation for Officers and their families, originally constructed by the RAF, were constructed. These are a range of detached and semi-detached houses with generous gardens and dense surrounding planting which would have provided privacy and separation from the wider airfield. This area is of a completely different character to much of the Conservation Area and reflects the relative comfort and privacy which the Officers were able to enjoy. It strongly contrasts with the bleakness and openness of the Flying Field as it was developed in the Cold War.

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

5.50 The Conservation Area Appraisal considers the setting of the conservation area at section 3.4. This states:

The site of the airbase is surrounded by farmland interspersed with small villages. There are a small number of outlying farms and associated farm buildings but generally the countryside is devoid of farm outbuildings or structures. Boundaries where they exist are traditional hedgerow.

The character of the adjacent farmland with the regular pattern of boundaries is at odds with the openness of the flying field. The density and arrangement of buildings within the flying field are indicative of modern human activity and do not replicate any of the more traditional patterns found within the villages or countryside. The boundary treatment is modern and defined by the needs of the site. Within the Technical Site and the Residential Areas the density and style of buildings are more urban than rural.

The creation of the rural landscape and that of the military base could not be more dissimilar. So whilst there has been an acceleration of change within the

countryside in recent times, it is the case that the landscape of the countryside has evolved over time. It is multi-layered, with different building types and materials that relate to the underlying geology. The site of the airbase is a landscape that has come into being for one major function, the result of change over a relatively short period of time and constructed from imported materials that have been chosen for their function and bear no relationship to the locality.

- 5.51 Figure 2 of the Appraisal identifies the visual influence of the airbase. The Site is included in red, indicating: *High – Airbase is a dominant visual element*. This presumably relates principally to the views of the hardened aircraft hangars visible from the Site, which are most prominent from the northern part of the Site and are discussed in more detail at paragraphs 5.22-23 above.
- 5.52 Prior to the establishment of the airbase the local area was rural in character with the modest settlement of Upper Heyford and a series of dispersed farmsteads set within an arable landscape to the east. The airfield was effectively imposed on this landscape and designed for maximum efficiency, taking no account of existing field boundaries or planting. Other than the topography, the airfield does not appear to have been influenced by the local landscape in any way, rather it comprises a series of structures and hard standing that was imposed on the landscape. This strengthens the contrast between the airfield and the surrounding landscape. There is deliberately no interaction in function or use between the airfield, which is secured and surrounded by perimeter fencing, and this landscape which remained in agricultural use. This contrast in function and character is also evident when comparing the Flying Field with the residential and technical uses to the south, which lie within the Conservation Area. The Flying Field is enclosed by security fencing, providing a clear barrier between it and the emerging residential development to the south within the Technical Area.
- 5.53 The airbase was developed in this location due to the flat land, sitting on top of a plateau, while its expansion was dictated by the need to establish additional airbases further west (there is a cluster of existing airbases in Suffolk, Norfolk and Cambridgeshire which were deemed particularly vulnerable during the Cold War). It therefore was driven by availability and necessity, rather than the quality of the surrounding landscape or its overt rural character. It also did not develop in an isolated location, being immediately east of Upper Heyford.

- 5.54 The airfield was originally developed in close proximity to Upper Heyford, the modest village with medieval origins that lies to the west, and has become an established feature that would have influenced life there throughout the latter half of the 20th century. The ongoing construction activities during the Cold War and the basing of jets at RAF Upper Heyford in particular would have caused significant disturbance to the locals, with Cocroft noting (page 19) that there were numerous complaints regarding noise from the locals which prompted the construction of hush houses for engine testing. The airbase would have also offered sources of employment for the local population. This reflects the fact that the airbase was imposed on the existing landscape and residents and, while the employment opportunities would undoubtedly have been welcomed in this rural area, the additional threat linked to living in such proximity to a NATO airbase must have also led to significant fear and uncertainty.
- 5.55 The land immediately west of the Site is also unusual in that it houses North Ley Farm, which was developed in the 19th century and has remained despite the comprehensive changes to its surroundings caused by the development of RAF Upper Heyford. It is an incongruent feature within the local area, but provides further evidence of the local agricultural history of the area and the imposition of the airfield on this once arable landscape.
- 5.56 The development of the airbase with additional residential uses has strengthened the residential uses in the area and provides further contrast between the generally open and military character of the flying field and the surrounding land uses, which no longer relate to a military operation. However, the development generally conforms to the established street pattern, with a combination of dense development and some more open development, associated with the surrounding open spaces. When considering additional residential development outside of the Flying Field (for example as part of the redevelopment of the Technical Area and, more recently through the Pye Scheme which sits outside of the Conservation Area), it has been established that additional residential development can be accommodated without causing harm to the significance of the Flying Field and the structures within it. The Flying Field has always been experienced close to residential development and, while much of this development was historically related to the airfield, it has a marked contrast in design terms. The introduction of

further residential development has been approved within the Flying Field and within the setting of the Conservation Area, while the Technical Area has is also undergoing redevelopment to provide additional residential units.

- 5.57 The already approved and partly built out development, coupled with the additional development that has been approved, will provide a greater residential character within the Conservation Area and particularly within the Flying Field. This will reduce the openness of parts of the Flying Field and its military character. Furthermore, approved development close to the Site, which includes residential development at Parcels 21 and 23, and the introduction of the Creative City, with a large-scale new building and significant alterations to the existing Hardened Aircraft Shelters, will change the character of the southern part of the Flying Field and reduce the visual connection between the Site and the Conservation Area.
- 5.58 The surrounding landscape, including the Site, therefore contributes little to the significance of the Conservation Area. It provides a clear contrast between the military function of the airfield and the wider agricultural land, but the two were never functionally related and the airfield was a deliberately inward-looking and largely self-sustainable military landscape that was imposed on the local area. The Site permits some partial views of limited elements of the airfield (the Hardened Aircraft Shelters and boundary treatment, as discussed above) but does not allow for any appreciation of the historic interest of the wider airfield and does not provide an understanding of the important Cold War heritage and landscape that lies beyond. This experience will also be changed by the consented development within the Flying Field.
- 5.59 The Site forms only a small, peripheral part of one identified important viewpoint from the Conservation Area (that from Raven Close) which is located immediately adjacent to modern residential development within the Residential Area and looks onto a field parcel, with development beyond. The Site is separated by the existing development at Duvall Park and forms a peripheral part of this view which makes no contribution to the significance of the Conservation Area.
- 5.60 The significance of the Conservation Area is strongly drawn from its development as a hardened Cold War airbase, adapted to respond to the growing threat during the Cold War, and from its structures related to this phase of development. It also includes related uses and historic development, together with modern residential,

commercial and community development. The setting of the Conservation Area does not strongly contribute to its significance, with little understanding of the historic use and form of the Flying Field from beyond. The Site makes no contribution to the significance of the Conservation Area.

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it

- 5.61 The proposed development would alter an element of the Conservation Area's setting to the south of the Flying Field and east of the residential areas. However, it would be separated from the eastern boundary of the Conservation Area by the neighbouring field parcel, which has planning permission for residential development for 89 and 31 dwellings across the two field parcels. The current full planning application, which is under consideration, allows for development of 2-2.5 storey buildings which would ensure the Conservation Area is physically and visually separated from the Site.
- 5.62 The proposals will alter an element of the current, rural setting of the Conservation Area, introducing new built form and activity to this area, while also changing views from and into the Conservation Area. This will include changes to views of the Hardened Aircraft Shelters discussed above. From within the Site, this would include changes to views of the Hardened Aircraft Shelters from the south-east corner of the Site, where the structures are currently permitted above the treeline, with the eastern part of the Site forming the foreground to these views. However, the limited nature of these views which provide only a partial experience of one small element of the Conservation Area, do not contribute to the significance of the Conservation Area and their loss, or alteration, would not diminish its significance.
- 5.63 The closer views permitted from the northern part of the Site do allow for a greater appreciation of the Hardened Aircraft Shelters and reflect the contrast between the "hard" military landscape and the land beyond. However, as discussed at paragraph 5.25-27 above, the alteration of these views would not diminish the significance of the Shelters as non-designated heritage assets. In addition, the view only provides a fragmentary experience of the Conservation Area, with the Shelters seen in partial views devoid of their wider context. Even the group value that the seven Shelters share as a coherent grouping is not apparent in this view, while their association

with the wider Flying Field and the significance of the Conservation Area as a whole is not apparent. The changes to these views will not therefore diminish the ability to appreciate the significance of the Conservation Area, while the changes in land use and character will also retain a clear contrast with the Flying Field. Its significance as a hardened Cold War military landscape, and the connections between the various buildings and structures, will be unchanged.

- 5.64 The identified view within the Conservation Area Appraisal from Raven Close (Figure 11 of the Appraisal) will undergo limited change, with the proposed development visible beyond the existing static caravans. However, this view is currently taken from modern residential development provided as part of the redevelopment of the residential area and includes existing development. The Site makes no contribution to the significance of the Conservation Area within this view, being located well beyond the intervening agricultural land, and the slight change to it will have no impact on the significance of the Conservation Area, or residential area.
- 5.65 The Conservation Area has seen change to its use and character through the introduction of additional residential uses, which will be continued by the approved neighbouring development. In addition, the land south of the Flying Field has always provided a contrast in use and character, with the bungalows for the airmen and leafy Arts and Crafts dwellings for the Officers reflecting the British military's development of RAF Upper Heyford and providing a contrast with the stark and open Flying Field to the north, particularly as it was developed during the Cold War.
- 5.66 The development will not diminish the exceptional historic interest that the airfield, and the Flying Field in particular, possesses and will not alter the ability to appreciate and experience this Cold War military landscape. Those views that are afforded from within the Site are fragmentary and provide no detailed understanding of the historic strategic function of the wider airfield. Their loss, or alteration, will not therefore reduce the ability to appreciate the significance of the airfield.
- 5.67 The loss of rural context, or any perceived isolation, will also not diminish the hard, military character of the Flying Field or the ability to understand its historic function. The proposals will therefore have no impact on the high historic interest of the Conservation Area, when considered as a whole, and will have no impact on its significance.

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

- 5.68 No harm has been identified to the significance of the Conservation Area and no further mitigation measures are considered necessary. However, it should be noted that the current proposals are in outline only and future reserved matters applications will therefore provide the opportunity for further consideration of the layout, materials and scale of development within the Site.
- 5.69 Proposals would allow for lower height and density development to the northern extents of the development parcels which will allow views into the Conservation Area to be retained and potentially offer a looser grain of development in these areas, which will respond to the apparently random layout of the Shelters and the farmstead to the west. Development further south may provide a higher-density and more regimented pattern of development to reflect the residential development within the Conservation Area and the approved development immediately to the west of the Site. This will ensure that the proposals respond to their immediate context, including the heritage assets to the north and the proposed development to the west.

Step 5: Make and document the decision and monitor outcomes

The proposals will result in no harm to the significance of the RAF Upper Heyford Conservation Area and will comply with section 72 of the 1990 Act and Policy ESD15 of the local plan. The finding of no harm means that paragraph 202 of the NPPF is not engaged. However, the Conservation Officer did identify “less than substantial harm” arising from the proposed development, noting that this harm could be reduced at Reserved Matters stage. This has been confirmed by the Council within the Heritage Statement of Common Ground. The Case Officer subsequently assessed that this less than substantial harm would be outweighed by the public benefits of the proposed development (paragraph 9.43 of the Officer’s Report) and that the view of Officers was that heritage matters should not constitute a reason to refuse the planning application. Should less than substantial harm be identified, the planning balance required under paragraph 202 of the NPPF is provided at paragraph 4.112 of Mr Bainbridge’s Proof of Evidence.

6 CONCLUSIONS

- 6.1 The Appeal Site forms part of the setting of the RAF Upper Heyford Conservation Area and a grouping of seven Hardened Aircraft Shelters, which are identified as non-designated heritage assets, located within it.
- 6.2 RAF Upper Heyford has developed from the First World War, with key phases of its development related to its Cold War use and particularly its development as a hardened NATO airbase. Residential development has existed alongside the Flying Field since the inter-war period, although the quantum of residential development within the Residential and Technical areas has increased in recent years through the implementation of extant planning permissions. The approval of the hybrid application will also introduce additional residential development within the Flying Field, altering the character of this area and leading to the demolition of some structures, including a number of the stores within the Southern Bomb Stores. The construction of the Creative City will also change the form of the Hardened Aircraft Shelters and their settings, further separating them from the Site.
- 6.3 Residential development within the setting of the Conservation Area (and immediately west of the Site) has also been approved. These changes demonstrate the shift in the character and use of the Airbase from a military operation to a new settlement, with some commercial uses and significant amounts of residential development.
- 6.4 The setting of the Conservation Area is generally rural in character, but also includes some limited residential development. The setting of the Hardened Aircraft Shelters is mixed and includes the related Flying Field and structures, 20th and 21st century residential development and rural land. The setting of the Shelters, and the structures themselves, will be changed by the approved hybrid application.
- 6.5 The Site currently forms part of this rural land and permits some views into the Conservation Area, including partial views of the Shelters, which would be reduced by the approved development. The Site contrasts with the hard military character of the Flying Field, but does not permit an appreciation of the historic function and development of the airbase. It makes no contribution to the significance of the Conservation Area, or the non-designated heritage assets within it.

- 6.6 The proposals will lead to a change within the setting of the Conservation Area and the reduction in rural context. However, this rural land use makes no contribution to the significance of the Conservation Area, with the development retaining the clear contrast between the Flying Field (and related structures) and the land beyond, which includes a mixture of residential and rural land uses. The proposals will have no impact on the historic or architectural interest of the Conservation Area, or on its overall significance.
- 6.7 The proposed development will have no impact on the significance of the RAF Upper Heyford Conservation Area, or the designated and non-designated heritage assets within it. The proposals comply with Policy ESD15 of the local plan, the third limb of Policy PD4 of the neighbourhood plan and the provision of the Planning (Listed Buildings and Conservation Areas) Act, 1990.