



Historic England

Ms Rebekah Morgan
Cherwell District Council
Development Control & Major Developments
Bodicote House, Bodicote
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Oxfordshire
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Direct Dial: 0207 973 3633

Our ref: P01142681

28 January 2020

Dear Ms Morgan

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**BICESTER HERITAGE, BUCKINGHAM ROAD, BICESTER, OXFORDSHIRE, OX26
5HA
Application No. 19/02708/OUT**

Thank you for your letter of 10 December 2019 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

The proposed development is located adjacent to and to the south-west of the group of two seagull trenches and two mushroom pillboxes that together form the scheduled monument.

The seagull trenches consist of a low brick wall and a concrete roof which allowed firing from a fairly inconspicuous but well protected location. Because the seagull trenches were 'blind' to the rear, the pair has been constructed back-to-back, covering each other. The two mushroom pillboxes offered protection on the flanks. The complex would also have included a position for an anti-aircraft Lewis gun.

RAF Bicester was considered vulnerable to enemy invasion, and it had a larger than average number of pillboxes and defended air-raid shelters, together with a Battle Headquarters to co-ordinate airfield defence. The complex of seagull trenches and mushroom pillboxes here (together with the Lewis gun) formed a significant part of that system, collectively offering all-round fire with the purpose of ensuring that enemy forces could be occupied long enough to allow reinforcements to arrive.

Most of the various elements of the defensive system were intended to cover the airfield (this being the most likely site for an invasion), rather than being intended to defend the airfield from attack from the surrounding countryside. Because of this the



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intervisibility of the surviving defensive elements, the other components of the airfield and the flying field itself are critical. While critical to the understanding of the operation of the seagull/mushroom complex itself, the south-west facing aspect - the direction of fire from the south-west seagull trench - can be considered to be of less significance than the north-east aspect in understanding how the complex fitted in to the overall system.

The proposed development will impact upon the appreciation of the function of the complex, insofar as it will make it harder to understand the operation of the south-west seagull trench because new buildings will effectively block much of the field of fire. It is the case that the setting in this direction has already been compromised to a degree by new buildings, but these are located some distance away across Skimmingdish Lane. There will therefore be harm to the significance of the historic asset.

The proposal offers as a public benefit the better management of the area around the seagull/mushroom complex, and removal of the dense scrub will certainly allow a better understanding of the main purpose of the defences here. Those public benefits are significant, but could (at least theoretically) be delivered by another mechanism other than development.

This application is outline only, and if the local authority is minded to permit the proposal subsequent design will be critical. The location and spacing of the new buildings might be arranged in such a way as to allow an understanding of the original south-west aspect, and a clear architectural statement would need to be made to avoid any perception that the new buildings are part of the original complex. The landscaping would need to be carefully considered, in particular with significant tree- and shrub- planting avoided.

The proposed development will cause harm to the significance of the scheduled monument. That harm will be less than substantial, but as a nationally important asset, great weight should be attached to the need to avoid harm. There are public benefits offered with the proposal in terms of improved management of the area surrounding the seagull/mushroom complex, although these might be achieved without the development itself.

The applicant also offers wider public economic benefits in terms of the overall management of a unique conservation area and its other designated assets, and Historic England acknowledges the excellent record of the applicant in this respect so far. It is for the local authority to decide if those wider benefits outweigh the harm to the asset identified above. If they do, reserved matters will need to be considered carefully in order to minimise the harm.

If planning permission is granted for this proposal, a condition should be attached requiring the submission of a management plan for the scheduled monument and the





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surrounding area, setting out proposals for any necessary repairs and subsequent long-term management.

Recommendation

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraph 196 of the NPPF.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely



Chris Welch

Inspector of Ancient Monuments

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