

19/02708/OUT

Development within the setting of multiple Heritage Assets (Scheduled Monuments and Listed Buildings) and within a Conservation Area.

Application Site

Bicester Heritage, Buckingham Road, Bicester.

Understanding the heritage assets affected

The site lies within the RAF Bicester conservation area within the south eastern part of the airfield (The Flying Field character zone). RAF Bicester is recognised as a rare survival of a 1930s military airbase which evidences Hugh Trenchards 1930's military offensive strategy in its layout, building design, use and functional interrelationships between the buildings. The survival of RAF Bicester owes much to its limited use during and after the war. The flying field retains the form and extent of runways that would have existed at the outbreak of war in 1939 and this is special because the grass runways survive and were never 'upgraded' to concrete. The airfield is protected principally for its 1920's origins, however the WWII additions are also important as they tell the story of the airfield as a whole and its development. The application site contains mushroom pillboxes and a seagull trenches that form part of the Scheduled Monument. Because of its location the application site is also considered to be within the setting of a number of Listed buildings, these include the hangers and other buildings that make up the historic technical site.

Significance

The significance of the RAF Bicester Conservation Area is that it is a rare survival of a 1930's military airbase with the remains of a 1920's airfield. However within the conservation area individual elements contribute to the overall significance but also have significance in their own right. The historic technical site contains a number of Listed Buildings and structures that are significant because of their role in the operation of the airfield. The flying field is significant because it is key to the function and legibility of the site and it also physically retains its pre 1939 form. Lastly the defensive structures and other associated structures around the flying field are of significance due to the fabric that remains and their illustration of historical airfield defences. The interrelationships between these elements probably makes the strongest contribution to significance.

Proposals

OUTLINE – Provide new employment units comprising B1 (Business), B'' (General Industrial), B8 (Storage) and D1 (Education) uses with ancillary offices, storage, display and sales, with all matters reserved except for access.

Appraisal of issues

The Listed Buildings of the technical site, the Scheduled Monuments and the flying field together all make up the character of the conservation area. Therefore any development that alters any part of this will have some impact on the conservation area as a whole. This proposal is part of a greater undertaking to redevelop and restore the RAF Bicester site.

This outline application is for development to the south east of the site within the Flying Field character zone and adjacent to some existing large industrial/storage buildings that sit outside of the conservation area. As a result of this proposed location on the south east edge of the conservation area and the indicative form and massing of the buildings it is considered that the impact on the technical site with its Listed hangers and other buildings would be minimal. Therefore it is considered that there would be limited harm to the technical site character area and the historic assets located within it as a result of the development within their setting.

The impacts are however substantially different for the Scheduled Monument that lies within the application site. Assessing the impact of development on a Scheduled Monument falls primarily within the remit of Historic England. However because of its significance and contribution to the RAF Bicester conservation area impacts to the Scheduled Monument should also be considered as impacts to the conservation area. These defensive structures that form part of the Scheduled Monument were designed to have high visibility outwards and therefore the land around them was open in nature. Locating buildings close to the mushroom pillboxes and

seagull trenches, although to one side only will inevitably result in some harm due to the changes to their setting. It is acknowledged that the proposals include the removal of vegetation arounds the Scheduled structures to better reveal them and this is welcomed however this could be achieved through general maintenance and therefore should not be depended upon this development.

Because the Scheduled Monuments form an important part of the conservation area, harm to them through development within their setting linked to the interrelationship with the flying field will consequently result in a negative impact on the character of the RAF Bicester Conservation Area. It is suggested that the final design and massing of the buildings will be key to reducing any harm and this could be further addressed by creating more space and gaps between the buildings. Planting and screening will also be crucial to how the development sits within the landscape. These aspects will need to be carefully considered if the proposals progress to reserved matters. As the proposal is outline only there are concerns that the development of the individual buildings could come forward in an ad hoc manner which would potentially result in further harm to the character of the area, it is therefore suggested that this needs to be carefully managed. It is suggested that where possible conditions are applied to any permission to control this and reduce the harm.

There are no objections to the access to the site proposed in terms of the material impacts. However it has been suggested that the new access to the east was an historic access to the site, this is questioned as from historic maps it appears that this track formed part of a route that ran within the airfield. It is not to say that the proposed main access is unacceptable in term of the impact on the heritage assets, however there are concerns that the site could become segregated from the rest of the RAF Bicester site and integrated access points would help to retain interdependency.

As previously indicated at pre application stage there are concerns about the move away from a masterplan approach and the consequences of this on the significance of the airfield (through development around the edge) and the conservation area. If further development were to be proposed the cumulative impacts of development of multiple sites within the conservation area and the encroachment of the airfield could result in unacceptable substantial harm to the heritage assets. The planning Practice Guidance: Conserving and Enhancing the Historic Environment, highlights this 'When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change'. The Historic England advice note, The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3, also advises on cumulative change and where significance may have been compromised in the past, additional change that may further detract from the significance of heritage assets needs to be considered.

Level of harm

Due to the impact to the Scheduled Monument through development within its setting the proposal is considered to result in less than substantial harm to the RAF Bicester Conservation Area, in agreement with the comments received from Historic England. The NPPF paragraph 196 states that harm should be weighed against the public benefit and it is acknowledged that the wider public benefit of the restoration and the continued viable use of the RAF Bicester site may outweigh the harm.

Policies and Guidance

The relevant local and national policies are as follows:

Cherwell District Council Local Plan Policy ESD15

This policy states that new development proposals should: Conserve, sustain and enhance designated and non-designated 'heritage assets' including buildings, features, archaeology, conservation areas and their settings, and ensure new development is sensitively sited and integrated, furthermore development should respect the traditional pattern of the form, scale and massing of buildings. the development is not considered to conserve, sustain or enhance the Conservation area and therefore does not comply with policy ESD15.

Cherwell Local Plan 1996 saved policies

Policy C23 states that there will be a presumption in favour of retaining buildings, walls, trees or other features which make a positive contribution to the character or appearance of a Conservation Area.

Policy C25 states that in considering proposals for development which would affect the site or setting of a Scheduled Ancient Monument, other nationally important archaeological sites and monuments of special local

importance, the Council will have regard to the desirability of maintaining its overall historic character, including its protection, enhancement and preservation where appropriate.

NPPF – Chapter 16

Paragraph 193 requires that when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the asset's conservation.

Paragraph 194 outlines that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

Paragraph 196 requires that where development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Planning (Listed Buildings and Conservation Areas) Act 1990

Section 72 of the Act requires that 'with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'.

Historic England Advice – The Setting of Heritage Assets

Historic Environment Good Practice Advice in Planning note 3,

Recommendation

There are concerns regarding the impact on character of the flying field character zone within the conservation area as a result of the proposals, any resulting harm needs to be weighed against the public benefit.

Officer / Date

Emma Harrison

05/03/2020