



Mr David Peckford  
Cherwell District Council

Direct Dial: 0207 973 3700

Our ref: P01426749  
25 May 2021

Dear Mr Peckford

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

**LAND AT FORMER RAF BICESTER, BICESTER, OXFORDSHIRE, OX26 5HA  
Application No. 21/01224/OUT**

Thank you for your letter of 26 April 2021 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.

**Summary**

The proposals would cause a significant level of harm to this exceedingly rare and important bomber training airbase and important features of the site are proposed for harmful change. The careful conservation of its many features and structures are required through policy Bicester 8 and the harm posed by the development demands both clear minimisation of harm and strong justification for any harm being caused. Stated aims in the application are for a sustainable future and a unified site together with preservation and enhancement of assets, yet these benefits are ill-defined and there is no clear mechanism for their delivery. We acknowledge and support the excellent, sensitive conservation that has been done at the technical site and hope that a scheme can be reached that achieves a similar level of high-quality conservation for the flying field and other structures at the base.

**Historic England Advice**

Significance of the former airfield and its features

RAF Bicester in Oxfordshire is the best-preserved bomber airfield from the period up to 1945 in the country. Although used as a training base rather than a base for frontline missions during World War Two it not only allows us to understand how a bomber base operated during this conflict but, possibly more importantly, it gives a vivid impression of what these places would have looked like during the War. Visiting the immensely evocative site offers a rare 'stepping back in time' experience that



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allows people to connect with a key point in our nation's history.

While the majority of the historic buildings on the site are concentrated in the 'trident' area in the south-west corner the entire airfield is of considerable significance. The grass flying field (inclusive of the 'periphery' areas to the north and north east that provided an essential overrun area, vital for training and missions) was the focal point of operations and the lack of a fixed runway allowed early aircraft to take off and land directly into the wind, which greatly assisted both getting airborne and landing with what were, by today's standards, low-powered aero-engines. Bicester is thought to be the only interwar RAF base to retain its grass flying field. A clear approach to the airfield from all sides was also important for safe operations, a feature that remains despite some recent development. Bomb stores, which were of course key to the operation of a bomber base, were situated at the far eastern end of the site, as far away from the rest of the base as possible.

The flying field also tells the story of how this 1920-30s base was adapted for use in World War Two more clearly than the 'trident' area. Parked bombers were dispersed over a large area on concrete hardstanding known as panhandles rather than concentrated in hangars to make them less vulnerable to air attack. While the panhandles have been lost the asphalt perimeter track remains in situ. To address the fear that the flying field could be attacked and taken over by enemy paratroops Seagull trenches and pill boxes were built to defend the site.

### Impact of the outline scheme

This outline application proposes an Experience Quarter with car galleries, demonstration circuits, and viewing pavilions. As presented in the indicative plans and Design Code, the scale and nature of the proposals would irrevocably change that 'stepping back in time' quality, and cause demonstrable harm to the conservation area and setting of statutorily protected structures and buildings within the former RAF base, in particular the grade II listed viewing tower which has a particularly close relationship with the flying field. This harm would occur in the following ways:

- 1) The development of the area to the north would remove the overrun area, which was an important safety feature at the base that allowed space for take offs to be aborted or landings to over-run. This area is defined as an integral part of the flying field Conservation Area Appraisal 2008 (Figure 12) and the Bicester Planning Brief 2009 (Fig 2).
- 2) The open and unencumbered character of the flying field is a key characteristic defined in the conservation area and building outside the perimeter track would seriously erode that. As well as contribution to the sense that RAF Bicester is a



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time capsule, that visiting is the closest you can get to experiencing what it was like to be at an airbase during the 30s or the Second World War, this open nature helps explain how the site was used. Heavily laden bombers would need a clear approach to take off and land in, unencumbered by buildings. The isolated nature of the site not only reflected the dangerous nature of flying bombers, which meant that they were best kept way from centres of population, but also reflected the need to place these bases away from towns to make them more difficult for the enemy to find.

- 3) Finally, the bombers would taxi to and from the panhandles to the runway on the perimeter track with the wheels on the track and the large wings greatly overhanging this. If the perimeter track is altered by bunds or other upstanding barriers or features its original function becomes much more difficult to understand.

We note that the spatial relationship within and between all the elements of the base (including the views from the viewing tower, views across the airfield, views towards open countryside (and the sense of that openness), and the open airfield inclusive of overrun areas) are identified as being important and worthy of conservation, in the conservation area appraisal.

Given the importance of the flying field to the site and the scale of the change proposed we consider this proposal would cause a high level of harm to the RAF Bicester conservation area and the listed buildings directly facing the flying field.

### Relevant Planning Policies

The Cherwell Local Plan (2011-2031) has a specific policy relating to the site, Bicester 8 in addition to broad heritage policy EDS 14. Policy Bicester 8 encourages a conservation-led proposal for a long-lasting economically viable future for the site, including technical site and flying field). Proposals must, under the policy, maintain and enhance the conservation area, protect listed, schedule and other important buildings and preserve the openness of the airfield.

The NPPF sets out, at paragraph 192, that the Council should take into account how sustaining and enhancing heritage significance can be achieved using places in a way that combines viability with conservation. Paragraph 190 encourages minimising the conflict between the conservation of a heritage asset and any proposals affecting it. Paragraph 193 requires great weight to be given to the conservation of heritage assets. Paragraph 194 sets out that any harm to significance should require clear and convincing justification. Finally, paragraph 196 makes clear that where less than





substantial harm would be caused this harm is weighed up against public benefits, including the optimum viable use.

### Advice on the current scheme and next steps

The Applicant recognises that their proposals involve major change that would be harmful to the significance of the site but argues that the heritage benefits associated with the proposals (set out in pages 8 and 53 onwards of the Heritage Statement) would outweigh this.

In our view these benefits are disappointingly nebulous, and do not nearly outweigh the harm that the proposals would cause. There is no clear link between the proposals and the repair of at risk buildings and structures on the airfield. Furthermore, a lack of defined masterplan adds to the uncertainty about what future direction development proposals could take.

Therefore in their current form the proposals cannot be said to be justified, as is required by paragraph 194 of the NPPF nor can the heritage benefits be said to outweigh the harm as is required by paragraph 196 of the Framework. Furthermore, it is not clear how the proposals would result in the long-lasting economically viable future for the site envisaged by Policy Bicester 8 of the Local Plan, neither would they achieve this policies aim of maintaining and enhancing the character and appearance of the conservation area, protecting listed, scheduled and other important buildings and preserving the full openness of the airfield.

We fully acknowledge that considerable good work has been done at RAF Bicester site and are supportive of finding ways for Bicester Motion to thrive on the site. But harmful development can only be accepted if it is demonstrably necessary to secure the future of this most special of places. We suggest a more conservation led approach is taken, which starts by defining the works necessary to make the site sustainable in the long-term and any further development is framed in terms of addressing these needs in the least harmful way possible.

A final note, the proposed experience site area appears to have historically been a farm alongside a long straight road (possibly Roman) and the Council should consult the County Archaeologist for their views on any possible archaeological impacts from the proposals.

### **Recommendation**

Historic England objects to the application on heritage grounds.

We consider that the application does not meet the requirements of the NPPF, in



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particular paragraph numbers 194 and 196, nor Cherwell Local Plan Policy Bicester 8.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Furthermore, section 38(6) of the Planning and Compulsory Purchase Act 2004 sets out the statutory duty to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

Yours sincerely

**Rachel Fletcher**

Inspector of Historic Buildings and Areas

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