

21/01224/OUT

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

Application Site

Land at former RAF Bicester, Bicester, Oxfordshire, OX26 6TB.

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 make a strong contribution to significance.

Proposals

Outline planning application for Automotive Experience Quarter comprising Commercial, Business and Services uses (Class E), Light Industrial (Class B2), Local Community and Learning Uses (Class F) and vehicle circuits (Sui Generis) with all matters reserved aside from that of access).

Appraisal of issues

The proposals are for a brand experience centre, this will include buildings to the north west of the airfield and to a lesser extent to the east. It will also include the installation of new tracks which will cover over half of the airfield within the historic perimeter track. As previously stated during the pre-application stage the incremental development that is occurring around the airfield will inevitably impact on the setting of the heritage assets. There are ongoing concerns that have been raised previously 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. The cumulative impacts of development of multiple sites within the conservation area and the encroachment of the airfield is a concern. Historic England's 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.

It is acknowledged that this proposal has no direct impacts on the Listed Buildings or scheduled monuments within the technical site or around the airfield, however their setting contributes to their significance and the setting will be altered as a result of these proposals. The proposals will also alter the appearance and character of the Conservation Area.

In appraising the issues it is considered the best approach is to address the individual aspects of the proposals.

Buildings

It is acknowledged that the buildings will be located outside of the perimeter track and therefore in the less sensitive part of the airfield. These over run areas do however have some significance and play an important role in the wider setting of the site. As previously advised, due to the nature of the outline application there are no definite designs proposed therefore it is difficult to comment on the aspects of design in particular. However it is noted that the proposals do provide parameter plans that indicate the scale and height of the buildings. If the principle of development is accepted with regards to the main experience centre building it is acknowledged that the height and indicative design is to be such that it will be subservient to the larger structures existing within the technical site and there are no substantial objections to this approach.

As raised at the pre application stage there are concerns regarding the additional pavilion buildings to the east of the flying field/perimeter track. These buildings will result in a further encroachment around the perimeter of the airfield which in turn will result in further visual impacts to and across the historic flying field. It was previously advised and is again suggested that a less harmful approach which lessens the visual impact to the flying field would be to group the new buildings together in one area. The spectator element required could be accommodated within the principal brand centre buildings. Due to the nature of the application it is not possible to comment on the detailed design of any of the proposed buildings.

Tracks and bunding

In principle the restoration of the perimeter track is welcomed, however this is subject to a detailed methodology and specification. The formation of new tracks within the airfield will result in notable changes to the flying field and the airfield as a whole. It is acknowledged that the new tracks are proposed to be subservient to the perimeter track and this is welcomed. However the perimeter track is significant as it is the historic access route around the airfield, intrinsic to its use and operation. It is therefore essential that this prominence is maintained and continues to be legible. The introduction of additional tracks will inevitably alter the appearance of the large grassed area of the flying field and will therefore have a visual impact. The treatment of the tracks will be key to the acceptability of the proposals and currently no details of surface treatment etc have been submitted. In order to fully assess the impacts more detail of the proposals in terms of treatment of the tracks in particular is needed.

It is acknowledged that following pre application discussions the proposals have been amended so that the need for barriers and bunding has been removed for large sections of the tracks. The application asserts that because of this, from the ground the introduction of additional tracks alone will have a minimal visual impact. This is not disputed outright but plans illustrating potential views across the airfield as a result of the development would better inform the assessment of harm. It is noted that some bunding is still required but no details of this (where it will be located and how big) have been provided. Bunding in front of the defence structures is mentioned and this is of concern. It is also noted that the requirement and therefore the impact may change depending on the end user and this could be harmful to the character of the airfield. The lack of physical structures/obstacles across the flying field is an important component of the setting and this should be preserved.

Visual impact and interrelationship

The proposals to create an experience centre will have an impact visually on the whole of the former RAF Bicester site. The additional buildings and structures will affect views both within and out of the conservation area. In particular the new buildings will alter vistas identified in the Conservation Area Appraisal. The visual interrelationship between the technical site and the defensive structures will be altered and more notable the views out to the countryside from the watch tower in particular will be impacted. It is accepted that the land around the RAF Bicester site as a whole has been changed substantially in recent times and the main building will sit against a backdrop of modern development. As a consequence the principle of development in this proposed location is more acceptable than elsewhere. However views to the north east have until now been maintained and it is felt that these should not be interrupted.

Public benefits and justification

It is acknowledged that substantial works have been completed within the Bicester site and this has been beneficial in multiple ways. The development of the site should be encouraged, and it is accepted this needs to be viable and sustainable for the site as a whole. Conversely the move away from a masterplan for the redevelopment of the site as a whole brings its own disadvantages. The cumulative impact of the individual developments is now becoming more extensive and the resulting harm to the site as one entity (former RAF Bicester) more notable. It is agreed by all parties that the proposed development will result in less than substantial harm to the significance of the Conservation Area and this is unavoidable. There are however opportunities to minimise this harm, for example in relation to the tracks, the bunding and the removal of the pavilion buildings as discussed above. The NPPF para 202 states that harm should be weighed against the public benefits. It should be pointed out that the lack of a formal masterplan approach for the entire site makes it more difficult to quantify and consequently deliver the public benefits. Unfortunately in relation to this proposal for the Experience Quarter it is felt that the public benefits that would outweigh the harm have not been adequately demonstrated. This concern was raised at the pre application stage and it was suggested that the restoration and maintenance of other notable heritage assets within the site such as but not exclusively the historic hangers, would be a substantial public benefit.

The application proposes a number of suggested heritage benefits but there are questions regarding how these can be effectively delivered as this has not been demonstrated within the application. The information submitted claims improved public access and interpretation of this important historic site, however it is questioned how this proposal in particular will provide this. It could be argued that public access and interpretation could be provided without additional development within the site.

Furthermore the application asserts that the development of the Experience Quarter will maintain a unified purpose for the site and maintain the important spatial and functional relationships within the site. It is questioned whether this can be achieved with the multiple uses proposed.

The NPPF paragraph 200 also 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. It is considered that currently a development of this size and type has not been fully justified when considered alongside the impacts of the proposals.

Level of harm

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 202 states that harm should be weighed against the public benefit. The accumulative harm of the multiple developments both past and future within the RAF Bicester site should not be disregarded.

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.

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 199 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 200 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 202 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 conservation area and the listed structures through development within their setting as a result of the proposals, any resulting harm needs to be weighed against the public benefit.

Officer / Date

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19/08/2021