

EDGARS

The Old Bank
39 Market Square
Witney OX28 6AD

Our Ref: 689/1845
Your Ref: 21/01224/OUT

11th October 2021

Dear Rebekah,

OUTLINE PLANNING APPLICATION FOR AUTOMOTIVE EXPERIENCE QUARTER COMPROSING COMMERCIAL, BUSINESS AND SERVICE USES (CLASS E), LIGHT INDUSTRIAL (CLASS B20, LOCAL COMMUNITY AND LEARNING USES (CLASS F) AND VEHICLE CIRCUITS (SUI GENERIS) WITH ALL MATTERS RESERVED ASIDE FROM THAT OF ACCESS AT LAND AT FORMER RAF BICESTER MOTION. PLANNING APPLICATION REFERENCE 21/01224/OUT.

I write further to our recent discussions in respect of the above planning application. The purpose of this letter to is to provide a comprehensive update following receipt of all the consultation responses, demonstrating that this is a policy compliant scheme with no technical objections. Where limited harm has been identified, this is outweighed by significant public (both economic and community) and heritage benefits.

Principle

Policy Bicester 8 identifies that the Council will encourage conservation-led proposals to secure a long-lasting economically viable future for the former RAF Bicester technical site and flying field.

Policy Bicester 8 identifies that the Council will support heritage tourism uses, leisure, recreation, employment and community uses.

The proposed development fully accords with the requirements of Policy Bicester 8 and makes effective use of Previously Developed Land.

In addition, as demonstrated below, there are no technical objections to this application.

Heritage

Bicester Motion recognises the unique nature of the site and the opportunity to 'create something truly special that builds on the emotive passion when in and around these buildings'. (Bicester Heritage Regeneration Strategy - Business Case). These proposals form part of the long-term

The Old Bank
39 Market Square
Witney OX28 6AD

One St Aldates
St Aldates
Oxford OX1 1DE

01865 731700
enquiries@edgarslimited.co.uk
edgarslimited.co.uk



Directors: Jayne Norris BA(Hons) MSc DipTp MRTPI, David Norris BA(Hons) MRICS AMaPS, Jon Westerman BA(Hons) DipTp MRTPI
Associates: Paul Slater BSc(Hons) MSc MRTPI

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strategy set out in the masterplan (Ridge and Partners), to repurpose the use of the former MOD site, creating new uses and activities whilst retaining the active flying field. Historic England explains that conservation-led development can demonstrate what can be achieved, with passion, creativity and confidence, to find solutions for what appears to be intractable problems to the conservation of heritage assets (Historic England, Constructive Conservation, 2013).

For RAF Bicester the heritage-led business model seeks to promote leisure, community, tourism and business initiatives in a way that sustains what is special about the former airbase, whilst creating something new, innovative and inspiring, as the next chapter in the site's history. The vision is to achieve this in a way that adds to people's understanding and enjoyment of a historic place, demonstrating that 'constructive conservation' is about embracing change for the benefit of the historic environment, the economy and for our health and wellbeing. Measures of the success will be exhibited in the restoration of the buildings and the landscape. This demonstrates the creative re-use of a redundant military airbase, the conservation of a site's history and the values it holds for people is not dependant on preserving a 'time capsule'. There is a more powerful story that can be told by allowing the place to continue to evolve and not freeze framed.

National policy and the local authority's approach to this site is to ensure that the historic assets are given a new use, making sure that those elements are properly integrated as a part of any new development. This ensures that new development is sensitive to the site's significance, as a whole and its constituent parts.

New development associated with the economic identity of the region (as a motor engineering, tourism and innovation hub) is proposed that can extend our experience of the place and add to the values that are currently attributed to it. This is not about erasing its history or how we experience it, it is about adding to it.

The layout and siting of the proposed Experience Quarter has been led by the operational requirements of the aerodrome operators, the character of the perimeter track, and the identified views of the airfield from within and without. The historic functional interrelationships that existed between the various parts of the site, the buildings, and the perimeter track and panhandle areas have been considered in the development of these proposals.

Good conservation practice and case studies demonstrate that the historic environment needs to have a use to sustain its significance. It is not the intention of the government to conserve all heritage assets solely as memorials of the past. What the applicant has demonstrated already is that the site and its buildings can fulfil new purpose without undermining significance. The outcome should not be to preserve a 'time capsule' but to give the site new meaning and purpose that builds on the unique history of its past. The sense of the history of the place and its unique qualities as a time capsule will be much better realised through re-use exploiting the creative and innovative energies that are already driving investment in the site.

The proposals are predicated on retaining the grass runways and their use for aviation. The revised location for the tracks is designed to ensure that what remains of the omni directional qualities that have been significantly reduced as a result of the urban expansion to the east of the Buckingham Road, can be preserved, retaining this aspect of the site's heritage significance.

There will still be a functional overrun area for the continued operation of the flying field for historic flight, which forms a central part of the proposals. Space is retained to provide a wide 'channel' to the east of buildings and to retain a visual connection with the rural context. Without reintroducing



aviation, the flying field has no function anymore, and is vulnerable to separation from the rest of the airfield.

Building outside the perimeter track helps preserve the open character of the flying field. A wide variety of RAF buildings were placed adjacent to the track, around the perimeter historically - this is a continuation of the story that the buildings in aerodromes interact with the flying field.

Repurposing the historic perimeter track by giving it a new purpose will aid public understanding of the workings of a wartime airfield. Beyond the perimeter track the evidence of the airfield structures and panhandle areas has been seriously depleted. The proposals involve retaining a memory of the panhandle areas therefore enhancing understanding of the wider dispersal strategy that characterised later development of the airfield.

The physical relationship of the airfield to its neighbouring uses (residential, commercial and agricultural) is a modern construct and no longer reflects the historic setting. Evidence of the farther outreach panhandle areas developed post 1939 no longer survive and the full extent of the former airfield cannot be appreciated.

Where views survive over existing tree belts to the countryside beyond they will be retained in a manner that will preserve understanding of the site's original setting. The overrun area where built form is proposed is not characterised by open views.

It is noted that the Conservation Officer continues to have concerns regarding the proposed pavilion buildings to the north of the airfield. Once the detailed siting, design and form of these buildings has progressed, it is considered that the impact of the pavilion buildings will be negligible, given that they will sit under the tree line of the established tree belt beyond. However, given that this is an outline application and on a without prejudice basis the parameter plans, and illustrative layout have been amended to omit the pavilion buildings.

The importance and heritage value of openness of the flying field and its aesthetic qualities as a very extensive tract of grass is acknowledged and this is why new development is focussed on those areas where the heritage value has been depleted and where the openness can be preserved. In this way new views across the flying field, which express its open character and large scale will be created.

The historic integrity and character of the airfield has been affected by earlier phases of 'fragmentation'... the loss of the panhandle areas, the severance (by ownership/redevelopment) of the housing and other support facilities (officers' quarters, barracks blocks, stores and dining room). Further fragmentation is a real threat to the heritage significance of the airfield. This proposal is part of the delivery of a masterplan that aims to ensure the heritage assets are not fragmented any further, focusing on the preservation and enhancement of their historical and visual interdependence and connectivity.

The proposals ensure that the flying field remains part of a unified whole - without new uses such as the track proposals and associated buildings, it is unlikely that it would be viable to continue operation as an active airfield, and could ultimately result in the subdivision of the site.

The watch tower will be repurposed as an observation deck for flying and driving. This is giving it a use that enhances, rather than diminishes, its historic designed function. Views and experience will be changed - it will no longer be a redundant airfield - but the heritage values that make it important will still be legible, sustained and crucially will be able to be accessed and appreciated.



The latest proposals are the result of a long process of consultation and collaboration with Cherwell District Council, Historic England, and local stakeholders. They also represent a stage in the delivery of the masterplan for the whole site and follows a good track record of repurposing historic buildings within the Technical Site, exemplary and award-winning designs for new buildings and very importantly a commitment to retain the historic integrity of the whole in single ownership with a singular vision for complementary and interdependent business enterprises. In addition, the proposals are the result of extensive collaboration between an experienced and diverse design team, all of whom have prioritised the heritage of the site.

It should be pointed out that the NPPF provides a basis for harm to be accommodated, provided that there are complimentary benefits. This is the case here where some harm is necessary in order to secure the future of the whole site. The heritage report concludes that there would be less than substantial harm. This is the conclusion of both Historic England and the District Council officers. The development will, as explained, deliver a significant level of heritage benefits, as well as other public benefits identified below, which outweigh the harm. The key characteristics of the airfield - openness and expansiveness - will be retained as part of the scheme. The legibility of the flying field will be enhanced by the continued aviation activity on it, including historic flight.

Ecology

The Ecological Assessment is underpinned by an extensive suite of ecological surveys completed between 2018 and 2019. These surveys have allowed for a robust and comprehensive understanding of the baseline situation and are sufficient to inform impact assessment, alongside opportunities for biodiversity enhancement.

It is noted that updated survey work undertaken across the wider site in 2021 has reaffirmed the habitats on site remain unchanged, providing additional reassurance that the findings of previous surveys remain valid and appropriate.

Notwithstanding that the Experience Quarter proposals are to come forward as a standalone application, the importance of understanding ecological impacts as a result of development across the wider Bicester Motion site (i.e. the cumulative impacts and opportunities across all anticipated development phases) is acknowledged. To this end, Ecology Solutions have continued to advise on the formation of a site wide masterplan, the implementation of which would ensure re-development of the wider site (including the Experience Quarter site) would avoid adverse ecological impacts and indeed would ensure opportunities for biodiversity enhancement are realised. This approach was discussed and agreed through pre-application discussions with Cherwell District Council (CDC) officers.

Designated Sites

No statutory designated sites were recorded within or immediately adjacent to the Experience Quarter Site. The Experience Quarter Site includes for parts of two non-statutory sites, Bicester Airfield LWS, and Stratton Audley Quarry LWS. The majority of both sites lies outside of the Experience Quarter red line boundary, but within the wider site. Habitat survey work in 2018 (and reaffirmed through walkovers in 2021) has reaffirmed that both designated sites continue to support the features for which they were designated, albeit the value in some areas has been significantly diminished by on-going scrub succession. Due regard has been given to both LWS', with appropriate mitigation measures proposed to safeguard the sites' biodiversity interest in the long term.



Habitats

Much of the Experience Quarter Site comprises areas of hardstanding and short mown grassland. These habitats are considered of limited intrinsic value in the context of the Site. Habitats of relatively higher value include those areas of semi-improved calcareous grassland and (albeit to a lesser extent) recolonising hardstanding.

The proposals have sought to retain higher quality habitats wherever possible. Where losses are to occur, these will be more than mitigated for through targeted habitat creation and/or enhancement within the wider site. In particular, this will include for enhancements to substantial central areas of the site which currently support close mown, floristically poor grassland. Enhancements to this habitat will include for the creation and management of extensive Open Habitat Mosaic (approx. 27ha) and enhancement of approx. 9ha of species-poor grassland to become species-rich calcareous grassland.

The provision of these habitats, amongst other enhancements, will deliver significant biodiversity enhancements for the Experience Quarter site overall and will be complementary to both LWS within the wider site.

In order to further inform the enhancements realised, the proposals have been analysed using a Biodiversity Metric. To ensure consistency with previous phases (as agreed in principle with CDC officers and as is endorsed by Natural England) the Warwickshire calculator model has been used in this instance. The Experience Quarter calculator indicated those proposals would result in net gain of +69.6 habitat units as well as a 1.32 gain in hedgerow units. Both of these represent biodiversity net gains in excess of 10%.

Faunal Species

A number of protected species surveys and assessments have been undertaken across the wider site (including the Experience Quarter Site). These surveys have identified the wider site to support a range of species, not least a notable invertebrate assemblage (of regional value), a medium population of GCN, and small to medium population of common reptiles. Of additional interest is the presence of a modest assemblage of wintering and breeding birds, Badgers and low levels of foraging and commuting bats.

The Experience Quarter Site, as a component of the wider site, provides a subset of the wider resource for the above faunal assemblages, albeit it supports only a relatively limited range of the habitat mosaic present within the wider site (with much of the biodiversity interest confined to areas of Stratton Audley Quarry which are located to the south of the Experience Quarter Site). Opportunities nonetheless exist for common reptiles, GCN and a range of invertebrates within the Experience Quarter Site, with limited opportunities for foraging and commuting bats, and breeding and wintering birds.

Targeted avoidance, mitigation and enhancement measures have been identified in respect of each species / assemblage such that adverse impacts can be avoided, and enhancements secured.

Liaison with Consultees

Following submission of the planning application, Ecology Solutions have engaged with CDC's Ecology Officer to discuss the proposals.



CDC Ecology have confirmed the scope of surveys are acceptable and appropriate. Regarding mitigation measures, CDC Ecology have confirmed these as appropriate in principle, noting the scheme is outline in nature. As requested, the Biodiversity Calculator has been issued to CDC Ecology directly to provide further reassurance that betterment can be secured.

No outstanding concerns have been raised by CDC Ecology and as such it can be concluded that the proposed development is acceptable in regards biodiversity and nature conservation, with reference to local and national policy, and relevant legislation.

Implementation of the guiding principles and measures set out in the ecology report would enable the emerging development proposals for the Site to fully accord with planning policy for ecology and nature conservation at all administrative levels, whilst delivering the clearly identified requirements for (heritage based) conservation led development within the Site, in line with Policy Bicester 8.

Archaeology

Desk-based assessment work was undertaken for this site by Oxford Archaeology in 2019.

Subsequent to that report and based on communication with Richard Oram, Oxfordshire County Archaeologist, RPS arranged a geophysical survey over the site. The survey was carried out by TigerGeo in accordance with a Written Scheme of Investigation (WSI) which was sent to, and approved by, Richard Oram. Copies of the data have now been sent to Richard Oram along with a PDF copy of the report.

The survey identified a number of geophysical anomalies of a possible archaeological origin. Most of these can be attributed to the 20th century airfield and its development. This includes evidence for former hangars, likely demolished planes, buried ordnance and debris. Magnetic disturbance relating to a former farm, evident on historic mapping was also identified. A number of anomalies possibly related to former Prehistoric field systems and possible Prehistoric/Romano-British settlement were evident; however, these particular features were located in areas that will not be impacted by the proposals.

On completion of the report, RPS liaised with Richard Oram suggesting that any further archaeological investigation should be carried out under a pre-commencement condition attached to the planning permission. This was on the basis of there being no evidence that the archaeology on site would be of such significance to preclude development. Furthermore, the potential for the presence of buried unexploded ordnance and the need to close the airfield to undertake the trenching were also taken into account. However, Richard Oram is of the view that the trail trenching should be undertaken pre-determination. As discussed, given the challenges identified about and given additional cost to the applicant's I would suggest that the trail trenching is undertaking following the resolution to grant planning permission and whilst the S.106 agreement is being finalised. This approach has been followed elsewhere and would not prejudice the Council in anyway, if the trial trenching reveals anything of interest, the application could simply return back to Committee for further consideration.

Highways

Mode transport planning (mode) provided a Technical Note (TN005) response (dated 3rd September 2021) to OCC Highways' original consultation response (dated 14th May 2021).



This report (TN005) addressed all of the OCC Highways' comments, in relation to walking and (predominantly) cycling infrastructure, and concluded that the development will be suitably accessible by sustainable means.

The proposals to internally link walking and cycling connections (via 3m shared paths) connecting with the infrastructure previously approved as part of the Hotel and Command Works (planning permission refs: 18/01253/F & 18/01333/F, respectively) is considered appropriate and suitable to serve the development.

In addition, the Bicester Bicycle User Group (BUG) also provided comments (dated 25th May 2021) in relation to cycle infrastructure provision – the majority of these comments, pertaining to the application of LTN1/20 for this development, had parallels with the comments raised by OCC; and as such, these were congruently considered and addressed within the mode TN005 report, submitted to OCC Highways.

Following the submission of the TN005 report, including the subsequent review and consideration by the Council, OCC Highways has now updated their consultation response to one of 'no objection' (dated 28th September 2021), subject to various S106 Contributions, S278 Agreements and Planning Conditions (S106 items and Planning Conditions will be subject to some further consultation, discussion and agreement with both OCC & CDC).

OCC Highways has now concluded that, given the likely level of usage for pedestrians/cyclists associated with this development, the proposal to provide direct and continuous internal routes (3m shared paths) from the Hotel access (and associated off-site infrastructure) on Buckingham Road, is acceptable – providing that the detailed design on the standards, Inc. width, alignment and lighting etc. is appropriately conditioned. OCC state that the standard of route (3m wide shared footway/cycleway) would accord to the minimum required standards, as set out in the LTN1/20, which specifies, where usage is below a certain threshold, shared use facilities can be implemented.

In summary, the overall proposed access to the development is considered to be in accordance with NPPF, including also local & national design guidance standards (Inc., LTN1/20) for pedestrian and cycle infrastructure provision.

It should also be noted that a further mode Technical Note (TN004 – also dated 3rd September 2021) has been submitted to OCC Highways, regarding the public transport and 'bus failure' contribution requests – we are still awaiting a response from the Highway Authority in relation to these items, and will respond accordingly and in due course.

Economic Benefits

Oxford Brookes University have produced an Economic Impact Study on behalf of Bicester Motion (private and confidential). The report provides a detailed snapshot of the economic impact and employment supported by Bicester Motion's existing and future operations. The executive summary demonstrates that:

- The total economic impact of Bicester Motion is estimated to be over £6.7 million with 126 jobs supported in the UK economy (April 2019 – March 2020)



- The direct economic impact exceeds one million pounds (£1,121,593) with 20 jobs supported
- Close to a million pounds (£968,630) was spent on purchasing goods and services of which nearly half was sourced locally within 20 miles
- The economic impact of Bicester Motion's procurement is approximately £790,189 with 15 jobs supported in the UK economy
- The economic impact of the staff expenditure is estimated to be £471,246 with 8 jobs supported in the UK economy
- It is projected Bicester Motion welcomed over 100,000 visitors and they spend close to £3.75 million. The estimated visitor expenditure generates an economic impact of £4.32 million with 83 jobs supported in the UK economy
- The Experience Quarter is projected to generate the following contributions:
 - The economic impact by the proposed construction expenditure is £44 million with close to 600 jobs supported in the UK economy
 - The economic impact by estimated visitor expenditure is nearly £17 million with 322 jobs supported in the UK economy

Letter of support have been received from both Visit England and Experience Oxfordshire.

The letter from Visit England states:

Visit England recognise that the proposition is potentially of national significance and is a world-class development opportunity that can put a destination on the global map, they recognise also that a major investment in a development such as this would be a vote of confidence for the UK tourism sector.

The letter from Experience Oxfordshire concludes:

The development enhances the local offering, provides significant investment into the district, offers job creation and opportunity, and will help with economic growth and aid recovery post Covid19. This application should be welcomed and supported.

Letters of support have also been received from the Department for International Trade, OxLep and Motorsport UK.

As such, the proposed development is considered to be in accordance with Policy SLE1 (Employment Development).

Public Benefits

- The proposal will contribute to the delivery of the Council's objectives including sustainable economic growth;
- Contribute to achieving a long-term commercially successful future for the wider site;



- Contribute to repurposing the perimeter track and finding a new and long-term sustainable use for the airfield;
- Deliver substantial economic benefits to the town of Bicester and wider District;
- The proposed development will contribute to the success of Oxfordshire, which is a globally renowned region with a strong and diverse economy. This is demonstrated by the following key economic facts:
 - £22bn GVA is generated by Oxfordshire for the UK economy each year - having grown by 47% (£7.3bn) between 2006 and 2016;
 - Oxford University is ranked 1st in the Times Higher Education global rankings – approximately 14 miles from the site;
 - Oxfordshire is 1 of 3 net contributors to the UK exchequer;
 - 1,500 high-technology firms are located in Oxfordshire;
 - Oxfordshire includes one of the largest life sciences clusters in Europe and the highest concentration of science research facilities in western Europe;
 - 30 million people visit Oxfordshire each year;
 - 40,000 new private sector jobs have been created in the wider LEP area since 2011.
- Bicester itself is well-located to capitalise on Oxfordshire's success and other wider initiatives that will bring economic benefits to the town, including the following:
 - Local infrastructure funding;
 - The Cambridge – Milton Keynes – Oxford corridor and associated projects will increase the GVA of the area from £163bn to £250bn;
 - The Economic Development Strategy for Cherwell recognises that Bicester is provided with the opportunity to become a location for high value and knowledge-based business;
 - East-west rail will provide enhanced public transport connectivity for Bicester;
 - Improvements have been made to rail connectivity and these continue;
 - Bicester is identified as an eco-town; and
 - Growth in the housing stock at Bicester and a need to provide highly skilled employment opportunities.
- Provide public access to an otherwise closed and inaccessible site enabling understanding of this historic area;
- Develop an underutilised Previously Developed Site; and
- Deliver heritage benefits (which are public benefits) associated with the proposal.



Heritage Benefits

- Offering new ways of experiencing the airfield and ability for the public to see aviation taking place on the airfield
- Repurposing the historic perimeter track by giving it a new purpose that showcases the relationship between track and buildings on the Technical Site, thereby aiding public understanding of the workings of a wartime airfield;
- Sustaining the physical evidence of the panhandle areas and therefore enhancing understanding of the wider dispersal strategy that characterised later development of the airfield;
- Reinstating an historic dispersal route thereby opening up and enhancing views of the airfield
- Retaining and enhancing the continued use of the grass runways for aviation;
- Creating new views across the flying field, which express its open character and large scale;
- Ensuring the heritage assets are not fragmented any further, focusing on the preservation and enhancement of the historical and visual interdependence;
- Improving public access to the site, both physical and intellectual;
- Preserving the significance of the adjacent listed buildings and scheduled monuments by improving access;
- Providing new opportunities for the interpretation and enhancement of the memories associated with the site;
- Creating new experiences that derive from the site's history of innovation and experiment, with the potential to add new chapters to the history of the place, which in turn will be valued by society; and
- Ensuring that present and future generations can learn from and enjoy this component of our historic environment.

Other Matters

No objections have been raised by the Environmental Health Officer in respect of noise, contaminated land, air quality, odour or light pollution. Indeed, his consultation response concludes:

In fact it should be possible to improve the situation from the current unregulated use that has given rise to previous noise complaints to this department.

I hope the above assist in the preparation of your report to the Planning Committee on the 4th November. I would like to take this opportunity to thank you and your team for the assistance in shaping these proposals through the extensive pre-application engagement and your continued support during the consideration of the application.



If you require any further information or clarification, please do not hesitate to contact me.

Yours sincerely,

Jon Westerman BA (Hones) DipTP MRTPI
Director