



Historic England

Sir/Madam Planning
Cherwell District Council
Bodicote House
Bodicote
Banbury
Oxfordshire
OX15 4AA

Direct Dial: 0207 973 3633

Our ref: P01570137

15 January 2024

Dear Sir/Madam Planning

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

**THE INNOVATION QUARTER, BICESTER HERITAGE, BUCKINGHAM ROAD,
BICESTER, OXFORDSHIRE, OX26 5HA
Application No. 23/03438/REM**

Thank you for your letter of 16 December 2023 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 adjacent to the scheduled group of structures composed of two 'seagull' trenches arranged back-to-back and two flanking mushroom pillboxes, forming a self-contained defensive complex which would have protected RAF Bicester from an attack by paratroopers. The north-east facing trench would have covered the airfield, while the south-west facing seagull trench was evidently intended to provide fire over the southern part of the airfield which had been extended in that direction at the outset of WWII.

In our response to the outline application here ((19/02708/OUT) we noted the importance of arranging the layout of the proposed structures in such a way that the purpose of the south-west trench might be clearly understood. The importance of this was noted by your planning officer who stated in his report (at 9.69) that:

It is noted that at the reserved matters stage, the application will need to take great care in the design and layout of the buildings; reducing harm to the Scheduled Monument should be at the forefront of the design process. There will be an expectation for gaps between the buildings to be carefully sited to ensure they allow the original 'field of fire' to be understood and this important view through the development to be retained.



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We repeated this position in our response to your consultation on the application to amend Condition 3 (23/01941/F), where the parameter plan appears to show buildings directly in the field of fire with none of the gaps recommended by your planning officer.

We note the response to our comments that was submitted with application 23/01941/F from Nicholas Worrledge Associates (NWA). We do acknowledge that the current proposal offers some improvements on the layout shown on the indicative plans submitted with the original outline application. But a number of the points made in that response might be challenged. As stated there, there is modern industrial and housing development blocking the view, although in the SW aspect this is over 150m away. None of the panhandle (or 'frying pan') areas were directly in this direction, and most were considerably further away than the location of the proposed development. In any case, they are unlikely to have had any kind of blast proof earthworks around them in the form suggested by NWA. I am also unclear how barrage balloons would have been likely to block the field of fire in the event of enemy attack. It is also suggested that the south-west field of fire was never intended and that the SW trench was a result of a standardised design. But this is a *double* seagull trench - the two sections are separate and a single seagull trench could have been constructed just facing NE. The SW trench was evidently intended to cover the extended section of the airfield to the south, as part of an integrated system of defence.

The current proposal places a 40m wide two-storey building squarely in the intended field of fire of the SW seagull trench, and this must therefore impact upon an understanding of its purpose. We remain of the view that this will cause harm to the scheduled monument.

In our response to previous applications, we recommended that a condition should be attached requiring the submission of a management plan for the scheduled monument and the surrounding area, setting out proposals for any necessary repairs and subsequent long-term management. It is disappointing that the opportunity has not been taken to secure that benefit by condition.

This application will need to be determined in accordance with the policies set out in the heritage chapter of the National Planning Policy Framework. These require clear and convincing justification for any harm to the significance of a designated heritage asset and that this harm should be weighed against the public benefits of the scheme.

Recommendation

Historic England has concerns regarding the application on heritage grounds.

Your authority should take these representations into account and seek amendments,



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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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