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# Land and Buildings at RAF Upper Heyford, Heyford Park

Planning Statement in Support of Applications to  
Extend the Period for the Temporary Use of Land and  
Buildings

Submitted on Behalf of Paragon Fleet Solutions Ltd

June 2008

9 June 2008

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The logo for Drivers Jonas, featuring the company name in a white serif font inside a dark red square with a white border.

DRIVERS  
JONAS

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## Planning Statement in Support of Applications to Extend the Period for the Temporary Use of Land and Buildings

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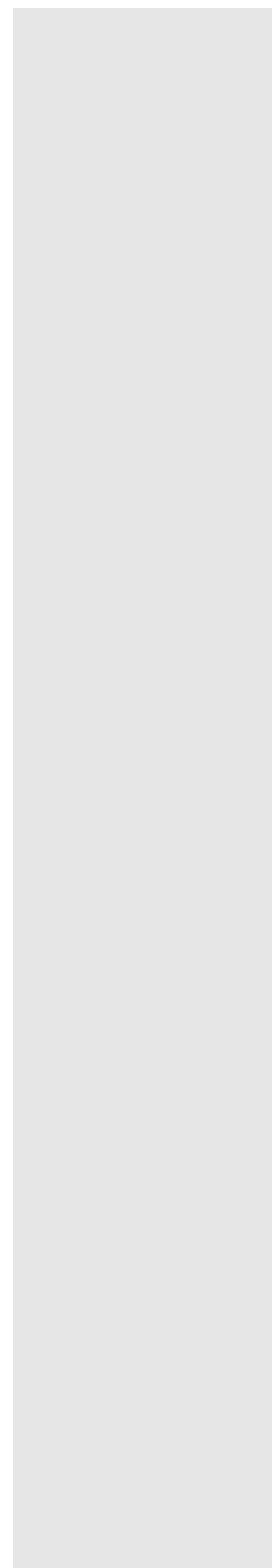
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## 1. Introduction

- 1.1 Drivers Jonas act on behalf of Paragon Fleet Solutions Limited, who are owned by Paragon Automotive Limited. For ease of reference, our Client is generally referred to as 'Paragon' throughout this statement.
- 1.2 This planning statement is submitted on behalf of our Client in support of 12 planning applications to further extend the time period for their temporary use of land and buildings at Upper Heyford.
- 1.3 The extant temporary planning permissions expire on 30 June 2008. They relate to a range of existing planning permissions, more particularly:
- n The change of use of land and various buildings to form premises for our Client's operations; and
  - n The continued retention of various structures and alterations to certain buildings in relation to our Client's use of the site.
- 1.4 The current planning applications seek to extend time limiting permissions by a further 5 years. A shorter time period of 3 years could be acceptable, but only if an appropriate permanent footprint was made available within this period.
- 1.5 The period for renewal is dictated by the availability of an appropriate permanent facility to be provided as part of a lasting arrangement for the airbase. The NOC's anticipated timetable is discussed in Section 6 of this Statement. Had the Council granted a longer renewal period than one year, as was proposed in the previous applications, this would have enabled greater clarity and planning certainty to be reached regarding the long term position and the need for submitting a further renewal at this time would have been avoided. The need for the frequent renewal of very short-term temporary planning permissions has meant business uncertainty for our Client.
- 1.6 This supporting statement is submitted to assist the local planning authority in the determination of the current applications. Applications have been prepared following engagement with Planning Officers from Cherwell District Council ("CDC"). Paragon has also worked very closely with the North Oxfordshire Consortium ("NOC").
- 1.7 In summary, this supporting statement aims to demonstrate that allowing a further temporary period for Paragon would be acceptable in terms of a wide range of planning policy requirements and objectives, is necessary to ensure the continuation of a range of economic and other benefits and, would in no way prejudice new settlement proposals for former RAF Upper Heyford.
- 1.8 This supporting statement consists of the following sections:
- n Section 2: Changes and Actions Since Previous Renewal Applications
  - n Section 3: Planning History;
  - n Section 4: Description of Proposed Development;
  - n Section 5: Paragon: Operation and Economic Importance;
  - n Section 6: The NOC's Approach and Timetable for New Settlement Proposals;
  - n Section 7: Planning Policy Context;



- n Section 8: Consideration of Issues; and
  - n Section 9: Summary and Conclusions.
- 1.9 Appendices are listed on the preceding contents page and referenced in relevant sections of this Statement.
- 1.10 This supporting statement should be read in conjunction with the separate Design and Access Statement and Visual Assessment which are also submitted to support the applications.



## 2. Changes and Actions Since the Previous Renewal Applications

2.1 Since the approval of the current suite of renewal permissions in August 2007, there have been a number of important changes of relevance to the consideration of the further renewal of time-limited permissions. These include:

- n The NOC's application for comprehensive development proposals;
- n The re-branding of our Client's business;
- n Examination of options to reduce vehicle processing area requirements; and
- n Emerging national planning policy on sustainable economic development.

### The NOC's Comprehensive Development Proposals

2.2 The NOC's outline planning application for a new settlement was registered by the Council on 6 November 2007 (application reference 07/02291/OUT). This application was appealed by the NOC on 3 March 2008 (appeal reference 08/00021/NONDET) on the grounds of non determination and this is to be considered at Public Inquiry on 30 September 2008 and is expected to last for 4 weeks. A duplicate planning application has also been submitted by the NOC to the Council which, at the time of preparing these renewal applications, is pending determination.

2.3 The NOC's proposed development is described by the Council as:

*Outline planning application for new settlement of 1075 dwellings, together with associated works and facilities including employment uses, community uses, school, playing fields and other physical and social infrastructure at Heyford Park, Camp Road, Upper Heyford.*

2.4 Section 2 of the supporting planning statement to the NOC's application provides a more detailed description of the proposed development. For the airfield area, paragraph 2.4 includes specific reference to an area of 17 hectares for "... vehicle preparation and car staging". This area, which is also shown indicatively at Appendix 8 to the Base Management Plan submitted with the application, has been proposed to seek to accommodate our Client's business as a permanent and integral part of the overall proposed settlement. Through the duplicate application, revisions to the permanent footprint proposed for our Client have been submitted, largely to address comments made by English Heritage.

2.5 A number of consultation responses have been submitted to the NOC's application which are of relevance to Paragon's future occupation at Upper Heyford. This includes comments from SEEDA and English Heritage which set out their positions on the NOC's application including in relation to the (permanent) retention of our Client.

### Re-branding of the Business

2.6 QEK was acquired by Paragon Automotive Ltd in February 2006. In December 2007, QEK carried out a corporate rebranding exercise to change its name to 'Paragon Fleet Solutions Limited'.

2.7 Procedurally, this means that renewals to the current personal permissions will require to be altered to reflect the new business name, albeit that the business is still the same legal entity as QEK, with the same company / registration number. More importantly however, this rebranding is a further important step in our Client’s long term plan and commitment to continue to build the business at Upper Heyford as an acknowledged centre of excellence, and to roll forward the employment growth and other benefits achieved since first locating at the site well over 10 years ago.

### Examination of Options to Reduce the Scale of Vehicle Processing Area

2.8 Since the grant of temporary permissions in 2007 and further to meetings with Planning Officers, Paragon has fundamentally examined a wide range of options in an effort to seek to minimise external vehicle processing in broad accordance with the objectives of the Comprehensive Planning Brief (“CPB”). The outcome of this exercise is summarised in **Table 2.1** below.

**Table 2.1: Options for Reducing Paragon’s Car Processing Area**

Summary of Option	Paragon’s Response
Relocate ‘stored’ vehicles to other Paragon sites or other sites in Cherwell District (i.e. the former Shipton on Cherwell Quarry near Bicester which has planning permission for filling and car storage).	<p>The business has examined alternative sites where various elements of the operation could be carried out however, this would be impractical from both an operational and financial perspective for the following reasons:</p> <ul style="list-style-type: none"> <li>• To move a vehicle at the end of life to alternative sites would represent an additional transport cost of about £60 per unit plus additional administrative, security and land costs. On the basis of 20,000 processed vehicles being made available for sale each year and only considering additional transport costs, this would represent a cost to the business of £1.2m. Clearly such an additional cost would impact on current business competitiveness;</li> <li>• The other Paragon sites are working at full capacity and do not have space but the same additional costs would apply in any event; and</li> <li>• Equally the use of the quarry near Bicester has been discounted in view of the above plus it is constrained in terms of availability (pending consideration by the Secretary of State) and would not meet the manufacturers storage standards.</li> </ul>
Relocate Paragon staff / outsource certain operations to local dealerships	<p>The response to this option from our customers is not supportive and a number of constraints associated with this approach also apply. Constraints include:</p> <ul style="list-style-type: none"> <li>• The concept of outsourcing our operations to local dealers is not practical as they would not be able to cope with both the complexity and volume of our work. Also, this approach would increase turnaround times for the vehicles which would result in us not meeting our clients Key Performance Indicators;</li> <li>• Space is at a premium within all dealerships and the focus of dealerships is high margin retail work and not commercial high volume production; and</li> <li>• Again this would introduce additional movement and administration costs.</li> </ul>
Streamline existing process flows and utilise	As a business we are constantly reviewing how we process all vehicles that pass through our hands to maximise the use of space.

Summary of Option	Paragon's Response
external processing areas more effectively	However, the reality is that however this is done a minimum area will always be required to enable the manoeuvring of vehicles into and around the site and between different processes and, there will always a maximum number of units that can be stored on an acre of land. Thus, the ability to improve current space utilisation through changes to flow processes and parking arrangements is very limited.
Use vehicle decking solutions (possibly including decking inside A Frame hangars) and / or underground parking	Consideration has been given to creating additional processing space by the use of decking and underground options. Both options have been fully discounted in view of cost and the resultant impacts that this would have on business competitiveness. External decking solutions on the land identified in the NOC's application for a permanent footprint would also create visibility issues compared to surface level arrangements.

- 2.9 Paragon, including in its former guise of QEK, has consistently identified that any changes in operational footprint must be phased over an appropriate time frame and importantly, be commercially viable and realistic in terms of business operations.
- 2.10 The renewal applications approved in August 2007 identified that the business could potentially operate over an absolute minimum permanent footprint of approximately 17 hectares (40 acres). This overall size requirement is generally reflected in the outline application for the new settlement. It is now clear that reducing to 17 hectares (40 acres) through one or a combination of the specific options set out in table 2.1, whilst at the same time maintaining the current range of customers / rates of economic and employment activity, would be unworkable due to a variety of operational, commercial and other reasons.
- 2.11 The commercial and operational reality is that in order to be a viable and competitive business in the market place and to maintain the level and highly skilled nature of employment and provide for an ability to further develop the business and customer base, there needs a critical mass of operational throughput. This, in turn, drives space requirements. As such, from a business perspective, retaining an overall approximately 24 hectare (60 acre) external processing area footprint is the optimum position. Any reduction in this footprint would require to be introduced over an appropriate lead-in period.

**Emerging National Planning Policy on Sustainable Economic Development**

- 2.12 Draft PPS 4 "*Planning for Sustainable Economic Development*" was published for consultation in December 2007. This document has been developed in response to recommendations made in Kate Barker's *Review of Land Use Planning* (December 2006), a commitment made in the White Paper *Planning for a Sustainable Future* (May 2007) and the proposals set out in the *Review of sub-national economic development and regeneration* (July 2007).
- 2.13 Although not yet formally adopted (adoption is expected late 2008), draft PPS4 does give a very clear indication of the Government's intentions in terms of national economic planning policy and the presumption in favour of sustainable economic development. The emerging policy themes and objectives of direct relevance to future planning decisions affecting Paragon are considered in detail at Sections 7 and 8 of this Statement.



### 3. Planning History

#### Introduction

- 3.1 Our Client [formerly Keddy Services and more latterly, operating under the name of QEK Global Solutions (UK) Ltd] relocated to Heyford Park in 1995 at the request of the Cherwell District Council in order to help preserve the local economy as well as the buildings, infrastructure and environment of the former RAF base. Since that time, our Client has been granted a number of planning permissions to secure their continued occupation at Upper Heyford.
- 3.2 There are two principal temporary planning permissions applying to the site. These originally date back to the mid 1990's and have been renewed on a number of occasions. Temporary planning permissions for smaller related proposals within the context of the principal consents have also been granted.
- 3.3 The following paragraphs summarise details of relevant site planning history concerning the renewal of time-limited planning permissions, with Council planning application references shown in *(brackets)*.

#### The Principal Temporary Planning Permissions

- 3.4 A five year temporary planning permission (95/00379/F) was initially granted in 1995 for the change of use of land and buildings to form headquarter and operation premises for motor industry, marketing, management and distribution company. This permission was subject to the completion of a lorry routing agreement. Condition 7 of the planning permission also imposed a maximum vehicle cap of 6,000 vehicles to be stored on the site at any one time for the reason of limiting the number of transporter movements associated with the site.
- 3.5 A further temporary planning permission was granted (96/00424/F) to include additional land and buildings to address the need for space as the business expanded.
- 3.6 Condition 7 of the planning permission for 96/00424/F imposed a maximum vehicle cap of 5,500 vehicles. Thus, together with 95/00379/F, permission was granted for a maximum of 11,500 vehicles to be staged over the entirety of our Client's site.
- 3.7 The principal applications were first renewed in 1998 with the effect of extending the temporary period until 3 May 2003. These applications were subject to a lorry routing agreement and completion of a Section 106 Agreement with the Council setting a maximum employee cap of 675 persons working at the site. The applications were also accompanied by a Unilateral Undertaking entered into by the North Oxfordshire Consortium.
- 3.8 The main purpose of the routeing agreement is to direct heavy commercial vehicles along specific approved routes to avoid traffic impacts, particularly on Upper Heyford and other villages located to the west of the site. This agreement has been updated as part of subsequent renewal applications, including in connection with the extant suite of temporary permissions.
- 3.9 A renewal of the principal planning applications was granted on 2 May 2003 to extend the temporary permission period until 3 May 2005 (02/02048/F and 02/02039/F) and subsequently on 14 July 2005 (05/00284/F and 05/00283/F) to extend the period up to June 2007.

3.10 Most recently the renewals of the current principal planning applications were approved on 9 August 2007 (07/01259/F and 07/01260/F), with details summarised in **Table 3.1**. An updated lorry routing agreement with Oxfordshire County Council was also completed in connection with the renewal permissions.

**‘Other’ Temporary Planning Permissions**

3.11 Other separate temporary planning permissions have been approved. These have related to the use, development and adaptation of other land and buildings within the context set by the principal consents.

3.12 These other permissions have followed a similar time line to the principal consents, also most recently being renewed in August 2007. Details of these other temporary planning permissions are summarised in **Table 3.2**.

**Summary of Current Temporary Planning Permissions**

**Table 3.1: Summary of Current Principal Temporary Permissions**

Application Ref	Summary of Proposal	Summary of Conditions
07/01259/F	Variation of Condition 1 of 05/00284/F to allow use of land and buildings by QEK until 30 June 2012	<ol style="list-style-type: none"> <li>1. Use shall terminate on or before 30 June 2008 and land and buildings restored to their original condition unless otherwise first agreed in writing with the LPA</li> <li>2. Personal permission to QEK</li> <li>3. Access shall only be from Camp Road via an existing entrance gate to the former airfield</li> </ol>
07/0160/F	Variation of Condition 1 of 05/00283/F to allow use of land and buildings by QEK until 30 June 2012	<ol style="list-style-type: none"> <li>1. Use shall terminate on or before 30 June 2008 and land and buildings restored to their original condition unless otherwise first agreed in writing with the LPA</li> <li>2. Personal permission to QEK</li> <li>3. Access shall only be from Camp Road via an existing entrance gate to the former airfield</li> </ol>

**Table 3.2: Summary of ‘Other’ Current Temporary Permissions**

Application Ref	Summary of Proposal	Summary of Conditions
07/01261/F	Variation of Condition 1 of 05/00278/F to allow use of mechanised car wash adj to building no. 80 by QEK until 30 June 2012 and to remove the restoration requirement at the end of this period	<ol style="list-style-type: none"> <li>1. Use shall terminate on or before 30 June 2008 and land and buildings restored to their original condition unless otherwise agreed in writing with the LPA</li> <li>2. Personal permission to QEK</li> </ol>
07/01262/F	Variation of Condition 1 of 05/00281/F to allow use of 6 no. lamp posts by QEK until 30 June 2012 and to remove the restoration requirement at the end of this period	<ol style="list-style-type: none"> <li>1. Use shall terminate on or before 30 June 2008 and land and buildings restored to their original condition unless otherwise agreed in writing with the LPA</li> <li>2. Personal permission to QEK</li> </ol>

Application Ref	Summary of Proposal	Summary of Conditions
07/01263/F	Variation of Condition 1 of 04/02683/F to allow use of a Liquid Petroleum Gas Tank and Air Intake Duct at Building 2002 QEK until 30 June 2012 and to remove the restoration requirement at the end of this period	<ol style="list-style-type: none"> <li>1. Use shall terminate on or before 30 June 2008 and land and buildings restored to their original condition unless otherwise first agreed in writing with the LPA</li> <li>2. Personal permission to QEK</li> </ol>
07/01264/F	Variation of Condition 1 of 05/00277/F to allow use of 2 no. lamp post by QEK until 30 June 2012 and to remove the restoration requirement at the end of this period	<ol style="list-style-type: none"> <li>1. 1 Use shall terminate on or before 30 June 2008 and land and buildings restored to their original condition unless otherwise first agreed in writing with the LPA</li> <li>2. Personal permission to QEK</li> </ol>
07/01265/F	Variation of Condition 1 of 05/00274/F to allow use of building no. 3205 by QEK 30 June 2012	<ol style="list-style-type: none"> <li>1. Use shall terminate on or before 30 June 2008 and land and buildings restored to their original condition unless otherwise first agreed in writing with the LPA</li> <li>2. Personal permission to QEK</li> <li>3. Access shall only be from Camp Road via an existing entrance gate to the former airfield</li> </ol>
07/01266/F	Variation of Condition 1 of 05/00279/F to allow the trench and concrete rings to remain until 30 June 2012	<ol style="list-style-type: none"> <li>1. Use shall terminate on or before 30 June 2008 and land and buildings restored to their original condition unless otherwise first agreed in writing with the LPA</li> <li>2. Personal permission to QEK</li> </ol>
07/01267/F	Variation of Condition 1 of 05/00280/F to allow use of building no. 354 by QEK until 30 June 2012	<ol style="list-style-type: none"> <li>1. Use shall terminate on or before 30 June 2008 and land and buildings restored to their original condition unless otherwise first agreed in writing with the LPA</li> <li>2. Personal permission to QEK</li> <li>3. Access shall only be from Camp Road via an existing entrance gate to the former airfield</li> </ol>
07/01268/F	Variation of Condition 1 of 05/00282/F to allow use of building no. 2002 by QEK until 30 June 2012	<ol style="list-style-type: none"> <li>1. Use shall terminate on or before 30 June 2008 and land and buildings restored to their original condition unless otherwise first agreed in writing with the LPA</li> <li>2. Personal permission to QEK</li> <li>3. Access shall only be from Camp Road via an existing entrance gate to the former airfield</li> </ol>
07/01269/F	Variation of Condition 1 of 05/00275/F to allow use of building no. 123 by QEK until 30 June 2012	<ol style="list-style-type: none"> <li>1. Use shall terminate on or before 30 June 2008 and land and buildings restored to their original condition unless otherwise first agreed in writing with the LPA</li> <li>2. Personal permission to QEK</li> <li>3. Access shall only be from Camp</li> </ol>

Application Ref	Summary of Proposal	Summary of Conditions
		Road via an existing entrance gate to the former airfield
07/01270/F	Variation of Conditions 1 of 05/00276/F to allow use of 3 no. hardened aircraft shelters by QEK until 30 June 2012	<ol style="list-style-type: none"> <li>1. Use shall terminate on or before 30 June 2008 and land and buildings restored to their original condition unless otherwise first agreed in writing with the LPA</li> <li>2. Personal permission to QEK</li> <li>3. Access shall only be from Camp Road via an existing entrance gate to the former airfield</li> </ol>

3.13 A plan illustrating the approximate extent of all application boundaries relating to the various existing temporary planning permissions is included in the separate Design and Access Statement.

## 4. Description of Proposed Development

4.1 The current time limited temporary planning permissions, as summarised in **Tables 3.1 and 3.2** in Section 3, expire on 30 June 2008. The main purpose of the current planning applications is to:

- n Extend the currently permitted temporary period by a further 5 years. (i.e. until 30 June 2013); and
- n Update conditions to replace references to 'QEK' with 'Paragon Fleet Solutions Limited' to reflect the re-branding of the business.

4.2 Our suggested wording for planning conditions is included at **Appendix 1** of this statement. In addition to existing personal conditions, our Client would also be willing to consider an appropriately worded condition to define the nature of activities to be carried out on external vehicle processing areas to address any concerns regarding use of the land for 'car storage' for example.

### The Proposed Duration and Extent of Further Temporary Permission

4.3 The CPB identifies that further personal and temporary permissions for the continuation of existing uses outside of the proposed settlement boundary will be acceptable subject to such uses being controlled by legal agreement that sets an annual reduction in the extent and amount of use in accordance with an agreed timescale and linked to the grant of permanent consent for the use to be satisfactorily accommodated within the settlement at the end of the period. A five year temporary period is identified in the CPB as appropriate as it is considered that this would coincide with the completion of 700 plus new dwellings and the completion of the new settlement.

4.4 Our Client has worked closely with the NOC to ensure that the further proposed temporary period is fully consistent with their timetable for provision of comprehensive settlement proposals and associated site infrastructure works. A position statement setting out the NOC's timetable for the new settlement is included at **Appendix 2** and discussed at Section 6 of this Statement. This timetable supersedes that assumed in the CPB (and upon which the suggested duration of temporary permissions included in the CPB was based).

4.5 In addition to ensuring an appropriate fit with the overall timing of the proposed comprehensive development at Upper Heyford, a sufficient further time period is important from Paragon's business perspective. The proposed renewal period of 5 years will provide much greater certainty for our Client and their customers than very short term temporary permissions such as the annual consents most recently approved. Customers must have confidence in Paragon's ability to deliver services and meet contractual requirements, which often span over a number of years. An inability to guarantee continuity of service over a sufficient period is a commercial constraint for the business. Similarly, very short term renewals of temporary planning permission impact on our Client's long term business and investment decisions in relation to the site.

### Transitional Arrangements

4.6 A permanent solution will enable the provision of mitigation measures not possible as part of temporary occupation, and which could be secured

through the imposition of appropriate planning conditions on the proposals for a permanent facility. Such measures could include:

- n Discontinuing the use of security lights at night through the provision of pressure sensitive underground cabling and associated infra red cameras around a permanent site perimeter. This will represent an investment of £175,000;
- n Where appropriate, a resultant ability to provide a lower level and less visually intrusive perimeter barrier than at present / envisaged previously; and
- n Appropriate site landscaping to minimise visual impact of vehicles.

4.7 In addition, transitional arrangements (and associated changes in current operational footprint) which may be possible in advance of moving to a permanent facility will provide an opportunity to also take account of comments raised by English Heritage and others in response to the NOC's outline application.

4.8 As part of the applications to renew temporary planning permission which were approved in August 2007, an approach towards possible transitional arrangements in advance of any permanent facility was put forward by our Client. This essentially sought to:

- n Undertake an annual review of vehicle processing area requirements over the life of the temporary permission (which was proposed in the applications for a duration of five years up to 30 June 2012);
- n To implement any transitional changes in footprint (including any reductions in vehicle processing area) as a result of the annual reviews, having due regard to business and operational considerations; and
- n At the end of the five year period or on completion of all new residential development provided as part of the NOC's comprehensive new settlement proposals should the dates be different, to move to a permanent footprint of circa 40 acres.

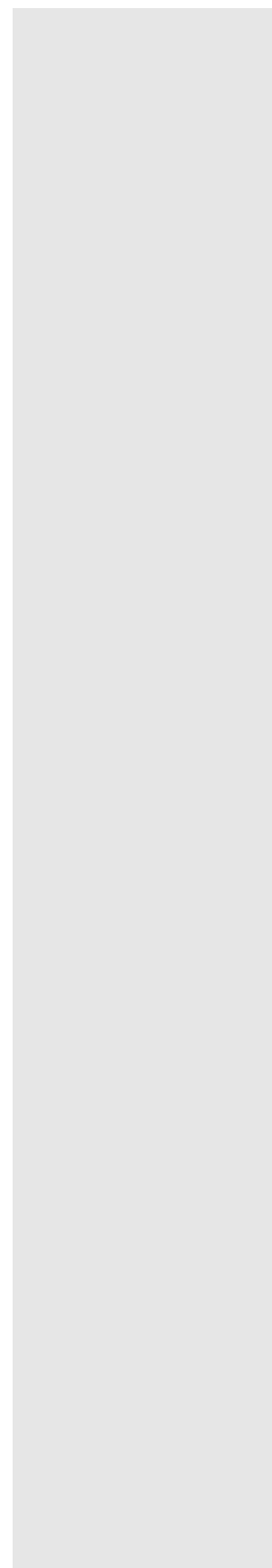
4.9 The above approach to transitional arrangements was not supported by the Council mainly because it was considered that it would not provide sufficient certainty that there would be a reduction in 'car storage' within the transitional period and that, at the end of the period, the permanent facility would exceed that identified in the CPB.

4.10 Our Client has consistently identified to the Council that the area identified in the CPB as being potentially suitable for 'car storage' would be insufficient to meet the operational and commercial vehicle processing area requirements of the business. Indeed, as noted above, an external vehicle processing area of 24 hectares (60 acres) would be the optimum position in ensuring the current rates of economic and employment activity and the opportunity to further grown the business and its already significant employment base.

4.11 Notwithstanding the Council's previous position however, our Client would be willing to explore further with the Council Heads of Terms to be reflected in any legal agreement to deal with transitional arrangements in the context the current renewal applications.

4.12 At this stage and as a basis for further discussion, consideration could be given to the removal of vehicles from the main runway and eastern taxiway

[and relocation to new areas as necessary, including that created on the former tanker area (as defined for 'car storage' in the CBP)].



## 5. Paragon's Operations

### Background

- 5.1 Paragon's current site covers a total site area of circa 61 hectares (150 acres) comprising office accommodation, technical workshops, ancillary facilities, grassed areas, and around 24 hectares (60 acres) net hardstanding. Further details on the site and its context is included in the associated Design and Access Statement.
- 5.2 Our Client has previously reduced its staging area, with approximately 10 hectares (25 acres) of net hardstanding at the far end of the eastern taxiway and runway released from the land included within the former planning permission 02/02039/F. More recently, vehicles were removed from a further 1.4 hectares (3.5 acres) of hardstanding on part of the main runway to address visibility considerations.
- 5.3 Despite reducing the physical scale of operations at Upper Heyford, the specialist, technical and skilled nature of the business has evolved so that the employment and other benefits provided by our Client to Cherwell District have continued to grow over time.
- 5.4 Paragon is a specialist provider of market support, technical services and training to the automotive industry. Our Client's long term business vision for its operation at Upper Heyford is to continue to grow the business and increase their staff, skills, knowledge base and contribution to the local economy. As part of the delivery of this business vision, Paragon has recently been successful in winning new contracts with two major vehicle manufacturers (BMW and Alfa Romeo), expanding its already significant list of prestige customers. This further demonstrates our Client's intentions for its operations at Upper Heyford and the future opportunity for even more growth of the business, and the resultant creation of additional employment opportunities.
- 5.5 It is important to properly distinguish Paragon from a low tech, low skilled and low employee generating car storage operator. Our Client does not store cars but rather processes live vehicles is an integral part of their overall business. Provision of adequate vehicle processing areas is therefore a necessary supporting element to the main technical and specialised operations which take place on site.
- 5.6 More particularly, our Client provides a highly skilled, employment-intensive operation for the automotive industry and is now widely acknowledged as providing a 'Centre of Excellence' at Upper Heyford, with a broad customer base including a large number of major and prestige car manufacturers. The development of IT solutions and a highly skilled workforce means that Paragon is recognised as providing the highest level of technical expertise available in the UK to automotive clients who entrust their most sensitive and advanced models to our Client's care. The volume of specialised vehicles processed is unique to our Client due to the fact that they have the highest concentration of Master Technicians and Licensed Technicians in the country.
- 5.7 Further explanation of the main operational processes and the nature of business activities which take pace on site is included at **Appendix 3** and in the Design and Access Statement.
- 5.8 Retention at Upper Heyford will only be possible where the business is able to continue to operate in a commercially viable way. The absence of



Paragon from Upper Heyford (and Cherwell District) would remove the substantial economic and other benefits it already contributes and in the longer term, would impact on achieving the most sustainable form of new settlement.

- 5.9 The following paragraphs describe various details which demonstrate the importance of Paragon to the local economy and community.

### Local Economic Benefits

- 5.10 It is acknowledged that Cherwell District, and Oxfordshire as a whole, has a relatively low unemployment rate. This being said, the contribution that Paragon makes to the local economy, including not only the number of jobs provided, but also the nature of these jobs, is significant.

- 5.11 Paragon has an important part to play in meeting Regional Economic Strategy's objectives in terms of global competitiveness through smart growth and sustainable prosperity. Paragon's key role in supporting a number of the objectives of the Cherwell Economic Development Strategy (2007– 2011) is outlined in the bullet points below and a number of these benefits are considered in more detail in the sub-sections which follow.

- n Maintaining low unemployment and job-seeker claimant counts in the district, and also creating sufficient additional jobs by the end of 2011 to cope with the predicted increase in population - Paragon is a significant local employer employing circa 500 staff;
- n Reducing the wage difference between Cherwell and the South East as a whole – The average wage levels of Paragon's full time employees compare favourably to the average for Cherwell District;
- n Growing the knowledge economy by encouraging high-skilled business and high technology and increasing the number of people in SOC 2000 Groups 1 – 3 (Managers/ Senior Officials, Professional Occupations, Associated Professional and technical) – Paragon has a highly skilled workforce with a greater proportion of employees in SOC 2000 Groups 1-3 than the Cherwell average;
- n Increasing skill levels and access to training – Paragon operates a number of apprentice and training programmes; and
- n Developing a World Class Business Community – Paragon's operations at Upper Heyford are acknowledged by the industry as a 'Centre of Excellence' and as such, our Client has a number of major and prestige customers.

### Number of Jobs

- 5.12 As outlined above a key objective of the Cherwell's Economic Strategy is maintaining low levels of unemployment and also ensuring that enough jobs are created to accommodate predicted population increases in the coming years.
- 5.13 Paragon is the largest existing employer at Upper Heyford and the 3rd largest employer in Cherwell District, making a significant contribution to the local and regional economy. Our Client directly provides circa 500 jobs, approximately half of the total number of jobs currently provided at Upper Heyford.

**Types of Jobs**

- 5.14 Both the Regional and the Local Economic Development Strategy recognise the importance of encouraging high-skilled and high-tech entrepreneurship in order to diversify the economy.
- 5.15 Paragon has a highly skilled workforce. As indicated in **Table 5.1** below, our Client has over 50% of its employees concentrated in SOC Groups 3 (Associate Professional and Technical) and 5 (Skilled Trade Occupations), which is significant when compared to Cherwell District.

**Table 4.1: Breakdown of Employees by SOC Grouping**

SOC 2000 Group	Paragon (%)	Cherwell (%)	Difference (%)
SOC Major Group 1-3	40.0	35.8	+ 4.2%
1 Managers & Senior Officials	6.0	14.8	- 8.8
2 Professional Occupations	2.0	12.1	-10.1
3 Associate Professional & Technical	<u>32.0</u>	8.7	<u>+ 23.3</u>
SOC Major Group 4-5	49.0	30.7	+18.3
4 Administrative & Technical	27.0	19.7	+7.3
5 Skilled Trade Occupations	<u>22.0</u>	10.9	<u>+11.1</u>
SOC Major Group 6-7	0.0	15.3	-15.3
6 Personal Service Occupations	0.0	7.0	-7
7 Sales & Customer Service Occupations	0.0	8.2	-8.2
SOC Major Group 8-9	11.0	18.3	-7.3
8 Process Plant & Machine Operatives	10.0	7.8	-2.2
9 Elementary Occupations	1.0	10.4	-9.4

- 5.16 Paragon also employs a diverse range of ages, from young apprentices to a high concentration of workers aged 50 and over. A large proportion of Paragon’s employees are full time.

**Sustainable Employment and Training**

- 5.17 Enabling people to access quality employment has a two fold meaning in the Local Economic Development Strategy. It means in a physical sense ensuring employment is in sustainable locations that people can access without having to commute long distances to. It also means ensuring innovative solutions are created to break down barriers to good quality employment in terms of skills and experience.
- 5.18 Over one-third of Paragon’s employees live within Cherwell District. A large number of these people also live within 5 miles of the site and several are even resident in Upper Heyford itself. In addition, the retention of Paragon will ensure the availability of a large number of jobs of a high quality, and diverse range of employment opportunities potentially accessible to (new) local residents in the future. This is key to ensuring a sustainable and balanced long term settlement which will also ensure environmental benefits such as reducing the need to travel, thereby minimising greenhouse gas emissions etc.

- 5.19 Our Client actively works with the local educational community to support their objectives. Oxford & Cherwell College is one of 3 colleges comprising the National College for Motorsport. Paragon provides a unique contribution to the college as a Centre of Excellence for training opportunities.
- 5.20 Paragon (and in its former guise as QEK) has also developed strong links with local schools, notably Coopers School and Bicester Community College, offering work experience placements, presentations and site visits. In addition, our Client operates an apprentice program, with 20 technical apprentices employed during the last 2 years.
- 5.21 Given the highly skilled and specialised nature of operations, our Client is committed to employee development. Our Client's business has been recognised by various awards and accreditations for its significant emphasis on staff training and development. Our Client also supports a wide range of local community groups, educational and other organisations. Main training initiatives relate to the following key areas:
- n Professional and Management;
  - n IT; and
  - n Technical.
- 5.22 In recognition of our Client's commitment to training and development initiatives, our Client was awarded the Bicester Business Award for Best Practice in Staff Development.

**Contribution to the Economy**

- 5.23 Paragon makes a significant contribution to the local economy. Given existing wage levels and the fact that a large proportion of our Client's employees live locally, these jobs generate significant wage income and Gross Value Added benefits for the local economy and also the wider sub-regional and regional economy.
- 5.24 In addition to these direct economic benefits, Paragon as a business supports a wide range of local suppliers, services and other businesses in the local area. Examples of these include:
- n CT Walters Electricians;
  - n JG Plumbing;
  - n Primrose Landscaping;
  - n B-Line;
  - n ChemDry;
  - n The Flower Workshop;
  - n K2 Recruitment;
  - n Champion Recruitment;
  - n Woodlands Butchers; and
  - n Bicester Fresh Direct.
- 5.25 Although planning permissions have been granted on a temporary basis, this does not take away the fact that Paragon's workforce have become well embedded in the community. In turn, our Client's employees also support a wide range of shops, services and facilities in the area.

- 5.26 The importance of Paragon to the local economy is significant. Indeed, the serious economic implications that would arise should an employer such as our Client be lost from Upper Heyford, have been acknowledged by SEEDA in their letter of 19 February to the Council in response to the NOC's comprehensive planning application for Upper Heyford.

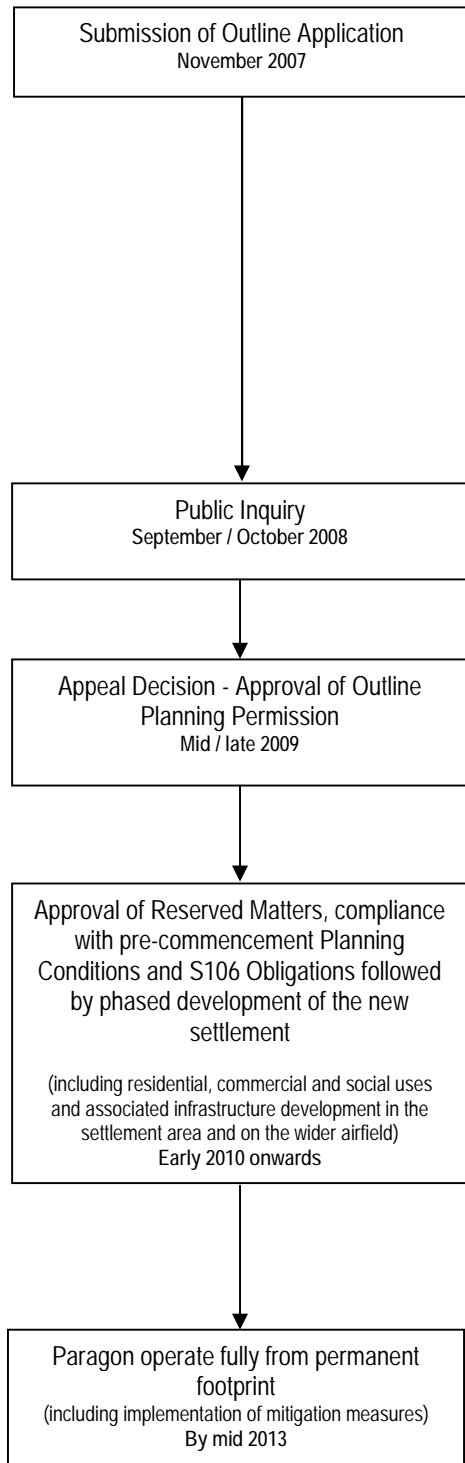
### Community Benefits

- 5.27 Our Client proactively supports a wide range of groups and organisations within the local community and becomes involved in a large number of local events and initiatives. Support and involvement relates in particular to the following:
- n Local and national charities (including Katharine House Hospice, Banbury Young and Homeless, Radcliffe Hospital, Leonard Cheshire Homes, BHF, Whizz Kidz, Cancer Research, Wooden Spoon and others);
  - n Various local organisations (including Weston-on-the-Green Parish Council, Bicester Town Council, local primary schools and sports clubs);
  - n Local events (Bicester Town Carnival, Steeple Aston Fireworks Display, Ardley & Fewcott Produce Show, Cooper School 'Going 4 It' Careers Fair and, Bicester Community College Sports Awards); and
  - n Bicester Chamber of Commerce and related organisations.

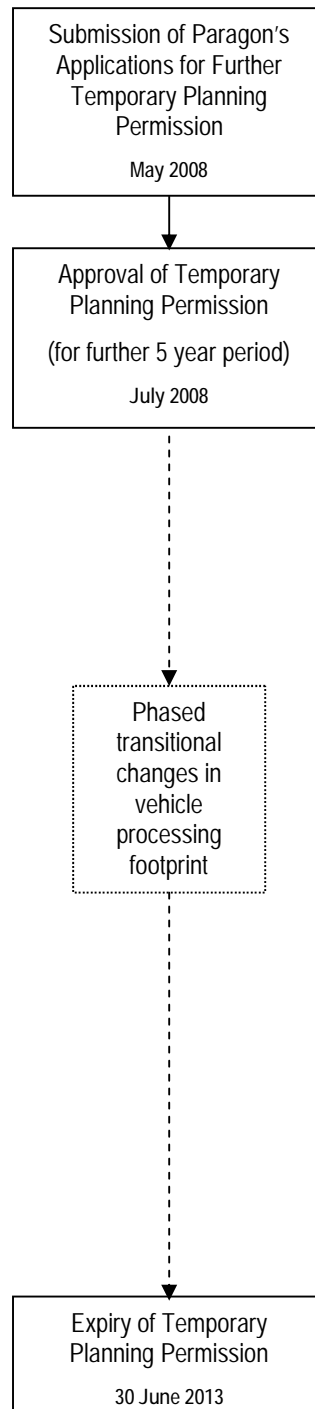
## 6. The NOC's Timetable for New Settlement Proposals

- 6.1 A position statement has been prepared by the NOC's planning advisors in respect of new settlement proposals. This position statement is reproduced in full at **Appendix 2**.
- 6.2 Following pre-application consultation, the NOC's outline planning application was registered by the Council in November 2007. An appeal against non-determination was lodged with the Secretary of State in March 2008. A duplicate application has also been submitted to the Council (currently pending determination). A Public Inquiry to consider the application will commence on 30 September 2008 and is expected to last 4 weeks. It has been identified that it will be a recovered appeal (i.e. to be determined by the SoS) which will lengthen the decision making process. A decision on the appeal is likely to be issued in mid 2009.
- 6.3 Following the grant of the outline planning permission (assumed now likely through the appeal process) and the subsequent approval of reserved matters and discharge of other planning conditions and obligations, it is now anticipated by the NOC that the development of new settlement proposals will commence in early 2010.
- 6.4 Given the scale and complexity of the site and associated development issues, development will necessarily be phased over a long period. Details of anticipated settlement phasing and construction periods which, together with the revised anticipated start date, is reflected in the duration of further temporary period sought.
- 6.5 The retention of Paragon for a further 5 year period will not impact on the timely and appropriate delivery of new settlement proposals. The NOC has confirmed that accommodation of our Client over this further temporary period and in the longer term will be consistent with their wider aspirations to achieve a balance of jobs, housing and securing environmental and heritage objectives. Indeed, the retention of our Client is identified as being an integral part of delivering a viable and workable lasting solution for the airfield site.
- 6.6 Based on details within the position statement, we have prepared the following flowchart to illustrate visually the NOC's predicted timescales compared with the proposed further temporary period proposed for our Client. This provides an updated position to that set out in the CPB.

**NOC's Anticipated Timescale for  
New Settlement Proposals**



**Paragon's Timescale  
for Temporary Permission**



## 7. Planning Policy Context Overview

- 7.1 The following local planning policy documents are of relevance to the development of land at the former RAF Upper Heyford:
- n The South East Plan;
  - n Oxfordshire Structure Plan;
  - n Cherwell District Local Plan and emerging Local Development Documents;
  - n RAF Upper Heyford Revised Comprehensive Planning Brief (“CPB”); and
  - n Upper Heyford Conservation Area Plan Appraisal.
- 7.2 In addition, draft PPS 4 ‘Planning for Sustainable Economic Development’ was published for consultation in December 2007.
- 7.3 Although not yet formally adopted (adoption is expected late 2008), draft PPS4 does give a very clear indication of the Government’s intentions in terms of national economic planning policy and the presumption in favour of sustainable economic development.

### The South East Plan

- 7.4 The draft South East Plan was submitted to Government in March 2006 and an Examination in Public (“EiP”) took place between November 2006 and March 2007. The EiP Panel Report was published in August 2007. The Secretary of State has yet to publish her proposed changes to the plan but this is expected by mid summer 2008.
- 7.5 The Plan’s vision for 2026 is for a healthier region, a more sustainable pattern of development and a dynamic and robust economy, the benefits of which are more widely shared.
- 7.6 ‘Smart growth’ is identified as key to the success of the South East region. This translates into five drivers of prosperity: employment; enterprise; innovation and creativity; skills, competition and business regulation; and investment in infrastructure. The Plan’s aspiration is for a buoyant economy with high and stable levels of economic and employment growth and an overall emphasis on innovation and enterprise. Ensuring the right supply of employment land will be important in this regard and local authorities should provide a range of sites and premises that are accessible to the existing and proposed labour supply. It is also noted that it will be important to more intensively use existing and underused sites and premises and, to promote mixed use developments and locations which intensify the use of existing sites.

### Oxfordshire Structure Plan

- 7.7 The Oxfordshire Structure Plan was adopted in 2005, covering the period to 2016. Policy H2 provides the adopted development plan policy context for new settlement proposals at Upper Heyford against which the NOC’s proposals will be considered.
- 7.8 In accordance with this Policy, Cherwell District Council approved a revised RAF Upper Heyford Comprehensive Planning Brief in March 2007. The purpose of this Brief is to ensure that the conservation of heritage resources, landscape, restoration, enhancement of biodiversity and other

improvements are achieved across the whole of the former airbase in association with the provision of a new settlement.

### Cherwell District Local Plan

- 7.9 The Cherwell District Local Plan was adopted in 1996, covering the period up to 2001. The adopted Local Plan remains part of the Statutory Development Plan and policies have been 'saved', until they are replaced by the Local Development Framework. Policies from the adopted local plan not listed in the schedule of saved policies expired on 27 September 2007 and are no longer used.
- 7.10 The District Council published a deposit draft review local plan in 2001 and revised deposit plan in 2002, to provide local policy guidance up to 2011. This Pre-Inquiry Changes ("PIC's") to the Cherwell District Local Plan Review were issued in June 2004. This included substantial amendments to policies relating to land at Upper Heyford.
- 7.11 Following advice from the Government Office for the South East ("GOSE") it was resolved by Cherwell District Council that the local plan review process be discontinued. The revised deposit plan, together with the PIC's, has been approved by the District Council as interim policy for use in development control decisions and renamed "The Non-Statutory Cherwell Local Plan 2011". This interim policy does not carry the same weight as an adopted plan, particularly in respect of new policies which have not been assessed at Inquiry or which have been the subject of significant objection.
- 7.12 Section 2 of the non-statutory Local Plan deals with the former RAF Upper Heyford but does not specifically relate to the continuation of temporary uses. In particular, Policies UH1 to UH4 relate to the development of the site for a new village, pursuant to the provisions of Structure Plan Policy H2.

### The Emerging Local Development Framework

- 7.13 The Council has prepared a Local Development Scheme which sets out the programme for the delivery of various elements of the LDF. Development Plan Documents ("DPDs") being prepared include the Core Strategy and a Site Allocations DPD (to which Paragon has previously commented in relation to the provision of a permanent facility at Heyford Park, most recently in March 2008).

### RAF Upper Heyford Revised Comprehensive Planning Brief (March 2007)

- 7.14 In 1999 Cherwell District Council first published a Comprehensive Planning Brief ("CPB") to guide the implementation of a new settlement at RAF Upper Heyford. A Revised CPB was approved on 5 March 2007. This replaced the original CPB and also supersedes separate supplementary planning guidance dealing specifically with temporary uses which was issued in September 2004. The CPB has been adopted as a 'Supplementary Planning Document' ("SPD"). Unlike DPD's, the CPB does not form part of the statutory Development Plan.
- 7.15 The revised CPB is intended to assist and guide the comprehensive redevelopment and long term management of the site. In accordance with Structure Plan Policy H2, the principles set out in the CPB primarily relate to the provision of around 1,000 dwellings with necessary supporting infrastructure, including appropriate employment uses, together with



objectives relating to design, sustainability, transport, the environment and future management. The conservation of the heritage interest at the site is also identified as an important objective reflecting the growing emphasis being placed on the Cold War value of the airbase.

- 7.16 The Brief identifies a specific area within the context of the new settlement which may be appropriate for a permanent facility for Paragon. In the interim, the CPB makes provision for the issuing of personal and temporary consents for the continuation of uses beyond the settlement area. It is suggested that such consents be controlled by a legal agreement that sets an annual reduction in the extent and amount of use in accordance with an agreed timescale and linked to the grant of a permanent consent for the use to be satisfactorily accommodated within the settlement at the end of that period.

### Upper Heyford Conservation Area Appraisal

- 7.17 The RAF Upper Heyford Conservation Area Appraisal was adopted by the Council in April 2006. As a result, the entire former RAF Upper Heyford site has been designated as a Conservation Area. A number of the buildings at the airbase are also statutorily listed, scheduled as ancient monuments or identified as being of national or local significance (although not considered worthy by English Heritage of being specifically listed).

### Kate Barker's Review of Land Use Planning (December 2006)

- 7.18 This independent review of the planning system concluded that there is a need for an enhanced focus on economic development so that planning decisions can be more responsive to the needs of changing economic circumstances and balance each of the components of sustainable development. Existing government guidance, including PPS1, already identifies the maintenance of high and stable levels of economic growth and employment as one of the four aims for sustainable development.
- 7.19 As noted previously, a key recommendation of the review is to update national planning policy on economic development by the end of this year. A number of key points are also identified as needing to be addressed. Those of particular relevance to Paragon's current proposals include:
- n Strengthening the consideration to be given to economic factors in planning policy, so that the range of direct and indirect economic benefits of development are fully factored into decision making alongside the consideration of other issues;
  - n Ensuring that development in rural communities is not unduly restrained and allows for a wide range of economic activity; and
  - n Improve current practices to ensure that decision makers understand better the imperatives of business, notably the locational needs of business and business planning.
- 7.20 In short, the Barker Review recommends that an elevated status should be attached to business and economic issues in the planning process.

### Planning for a Sustainable Future White Paper (May 2007)

- 7.21 The White Paper sets out a wide ranging package of reforms for the planning system. Carrying forward recommendations from Kate Barker's

review, proposals are intended to create a planning system that positively supports economic development and encourages greater investment, both domestic and foreign, in the UK economy.

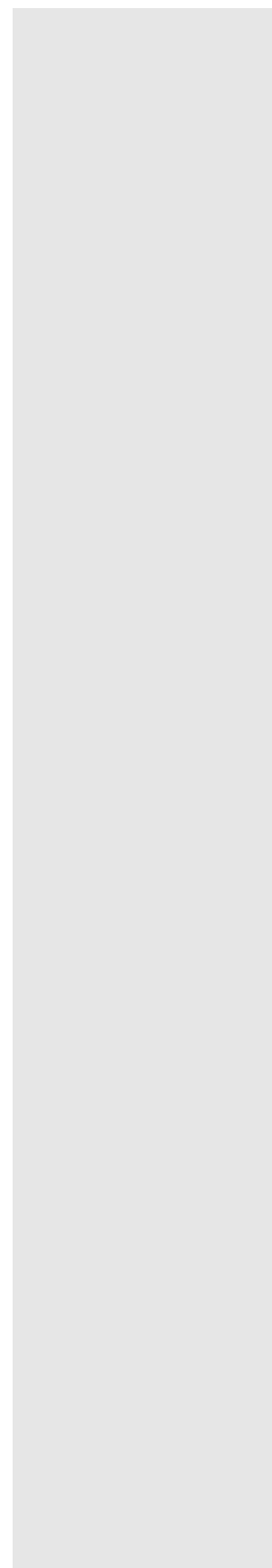
- 7.22 It makes clear that, in determining planning applications, local planning authorities must pay full regard to the economic as well as the environmental and social benefits of sustainable development. Other suggestions of particular relevance to our Client include:
- n In decision taking planning authorities should take full account of the longer term benefits, as well as the costs, of development that will create jobs, including those with wider benefits to national, regional or local economies by improving productivity and competitiveness;
  - n There will be a new approach to determining planning applications which do not have the specific support of plan policies, using market information as well as environmental and social information;
  - n Development plans should promote mixed-use development and respond to new forms of economic development enabling each locality to fulfill its potential; and
  - n Authorities should make better use of market information and other relevant evidence in planning for sustainable economic development and in considering specific proposals for development.

#### Draft PPS 4: Planning for Sustainable Economic Development (December 2007)

- 7.23 As noted in Section 2 of this Statement, draft PPS 4 “*Planning for Sustainable Economic Development*” was published for consultation in December 2007 in response to recommendations made in Kate Barker’s Review of Land Use Planning and the Planning White Paper and, most recently, to take account of the proposals set out in the Government’s review of sub-national economic development and regeneration.
- 7.24 Draft PPS4 sets out a number of important policy themes and objectives of direct relevance to future planning decisions affecting Paragon. Key themes and objectives identified for local planning authorities include the need to:
- n Plan positively and proactively to encourage economic development, including flexible policies able to respond to economic change;
  - n Use a wide evidence base to understand both existing business needs and likely changes in the market, to prepare policies to support sustainable economic development. This includes taking account of the different locational requirements of businesses, such as the size of site required;
  - n Plan for and facilitate a supply of land to cater for the different needs of businesses and the expected employment needs of the whole community but ensure that this is flexible enough to be responsive to a changing economy or new business requirements;
  - n Make the most efficient and effective use of land and buildings, especially vacant or derelict buildings (including historic buildings); and
  - n Adopt a positive and constructive approach towards proposals for economic development, operating within the context of the plan-led

system. This includes considering proposals favourably unless there is good reason to believe that the economic, social and/or environmental costs of development are likely to outweigh the benefits.

- 7.25 With regards to the final bullet point, PPS4 is essentially promoting a presumption in favour of sustainable economic development. In this case, it is considered that the balance is firmly in support of the retention of Paragon at Upper Heyford.



## 8. Consideration of Issues

### Introduction

- 8.1 As a general starting point, it is important to distinguish our Client from other (former) temporary automotive operators located at Upper Heyford, who were present at the time of drafting the CPB. Differences are not only economic and employment-related but also environmental, such as in relation to landscape, visibility and heritage, arising from important locational and operational differences.
- 8.2 Notwithstanding this position, the significance of any impacts arising as a result of the proposed further temporary period for Paragon should be assessed on the basis of their relatively short-term nature. Additionally, as part of transitional changes to our Client's existing operational footprint and ultimately, through the creation of a permanent facility as part of the comprehensive proposals for the former airbase, improvements to the current position can be achieved.
- 8.3 It is important to note that the CPB specifically provides for the further temporary continuation of existing uses beyond the proposed permanent settlement boundary, including in relation to '*storage or other external uses carried on by that company*'. Paragon's use clearly falls within the category.
- 8.4 The following paragraphs provide an assessment of our Client's proposal for a further 5 year extension of temporary planning permission, drawing together and considering key material planning issues.
- 8.5 Issues are generally discussed in the context of the existing physical extent of Paragon's current operations. As suggested however, changes and improvements to this position can be achieved over time.

### Economic Benefits

- 8.6 Section 5 of this statement considers our Client's economic benefits in detail but in short, due to the scale and highly skilled nature of employment provided, Paragon makes a significant contribution to a number of key regional and local economic objectives. Emerging national planning policy set out in draft PPS4 acknowledges the importance of supporting sustainable economic development and in essence, promotes a presumption in favour of such proposals. In the context of this policy, it is considered that the balance is firmly in support of the continued temporary (and ultimate long term) retention of our Client in a way that has full regard to the commercial needs of the business.
- 8.7 The economic benefits of Paragon, and the serious economic implications that would arise should our Client be forced to relocate from Upper Heyford are well understood. The importance of existing temporary occupiers at Upper Heyford, notably Paragon, has been recognised by the South East England Development Agency ("SEEDA").

### Heritage Issues

- 8.8 The Cold War features and areas at the former RAF Upper Heyford have been identified in a number of studies led by the Council including the Conservation Plan (September 2005), Conservation Area Appraisal (April 2006) and the consequent designation of the entire airbase as a

Conservation Area. The conclusions of these studies have also been considered in the revised Comprehensive Planning Brief (“CPB”).

- 8.9 A number of structures across the former airbase are now scheduled as ancient monuments or are statutorily listed. Several additional buildings are also identified as making a positive contribution to the conservation area and are proposed for retention in the CPB.
- 8.10 Since the USAF left the airbase in the mid 1990’s, our Client has played an important role in maintaining site security, the condition of site infrastructure and ecological resources. This further temporary permission will ensure that Paragon can continue their role in terms of maintaining the site, a role which has become more important since the heritage value of the overall base has become more formally recognised.
- 8.11 The retention of Paragon in their current form will ‘maintain’ the level of impacts on the Conservation Area and important buildings at the airbase, which have been designated / identified in the context of our Client’s presence at the site. Also, any negative impacts on the conservation area are less than when designated with the subsequent relocation of Walon, which occupied a more visible and sensitive part of the airbase. In addition, the further 5 year temporary period sought will provide an appropriate timeframe for our Client to consider transitional changes in operational footprint. Transitional changes (and the ultimate permanent footprint) will provide an opportunity for the phased removal of vehicles from the main runway and taxiways east of the group of hardened Aircraft Shelters. These changes would address the main concerns raised by English Heritage in their letter to the Council of 10 March 2008. In relation to ‘car staging’ this letter clarifies that:

*“Our view is that car storage on the main runway is not acceptable. Storage on the taxiways east of the Group of HAS’s is not acceptable because of the intervisibility with the main runway and the fact that the taxiways would have been kept clear to facilitate the movement of aircraft and therefore the uncluttered and empty appearance is part of their special character. Within the groups of shelters and sheds standing vehicles etc and activity was historically the norm and therefore the potential exists for car staging subject to the assessment of the precise requirements (e.g. position, number, signage etc). Interestingly the 7 HAS’s in the south eastern group currently provide some screening to the existing activity which will of course be lost if they are demolished.”*

- 8.12 In addition, changes could enable the delivery of other objectives identified for the site such as the re-opening of an appropriate alignment of Aves Ditch and removal of taxiways to enhance ecological interests.
- 8.13 In relation to the comments raised by English Heritage, these reflect the broad conclusions identified in a heritage assessment carried out on behalf of our Client in 2006. This study concluded that our Client’s use seemed entirely compatible with the utilitarian and industrial nature of the Cold War area (a full copy of this heritage assessment report has been submitted previously to the Council to assist in supporting our Client’s long term retention at Upper Heyford).
- 8.14 Notwithstanding the specific local planning policy support for the principle of the further continuation of temporary planning permission, and the ability to

address points identified by English Heritage, we set out below a more specific assessment of our Client's current operations against heritage objectives set out in the CPB, albeit that these objectives are more relevant to proposals for the permanent settlement. Further information on the heritage context in relation to Paragon's current site is included in the separate Design and Access Statement.

#### Impacts on the Conservation Area

- 8.15 The Conservation Area Appraisal identifies the area of the airbase to the north of the main runway (i.e. beyond Paragon's current site) as being of most importance in overall heritage terms by virtue of the fact that it has greater coherence containing the most clearly defined groups of buildings, both functionally and spatially.
- 8.16 Other than the section of the main runway used by Paragon for vehicle staging (and from which vehicles could be removed as part of transitional arrangements in any event), the majority of our Client's site benefiting from temporary planning permission lies outside of the '*Core Area of National Significance*' as defined in the CPB. Our Client has also previously reduced their permitted usage of the main runway to address visibility issues.
- 8.17 The remainder of Paragon's existing vehicle processing area is focused within that part of the flying field defined in the CPB for substantial clearance. The approach proposed for this area in the Brief suggests that its heritage importance is not the overriding consideration over the long term (albeit that our Client will be able to continue to maintain this area as part of the proposed further temporary permission). The potential for the use of this part of the site (excluding the land east of the HAS area) for 'car staging' has most recently been highlighted by English Heritage.
- 8.18 A number of our Client's administrative and technical buildings already fall within an area defined in the CPB as suitable for employment as part of a lasting arrangement. This also includes a number of important buildings occupied and maintained by our Client proposed for long term retention.
- 8.19 Paragon's current operational site area does not impact on other Conservation Areas in the locality. In addition to the visibility assessment and the views of the Council's Development Control Officer expressed in assessing previous applications for the renewal of temporary planning permissions (concerning the very limited availability of views of our Client's operations from outside of the airbase), this conclusion is also supported by the CPB. For example, Drawing 03C appended to the Brief shows the approximate 'cone of influence' relating to the setting of Rousham Park as only extending over the western part of the airfield.

#### Impacts on Important Buildings and Structures

- 8.20 Since the last renewal applications, a number of further buildings have been listed [including the Control Tower (Building 340) and Nose Docking Sheds (Buildings 325, 327 and 328)] although the position remains that there are no statutorily listed buildings or scheduled ancient monuments within the application site. Two ancient monuments lie adjacent to buildings within the technical area occupied by our Client [The Battle Command Centre (Building 126) and the Hardened Telephone Exchange (Building 129)]. The continued use of buildings by Paragon, such as their main office building [the former Station Armory (Building 125)] provides an important role in maintaining the setting of these adjacent buildings, which

are the only examples of ancient monuments within the extent of the settlement area defined in the CPB.

- 8.21 Paragon's current operations do not directly impact on other listed buildings and Scheduled Ancient Monuments elsewhere on the former airbase. Operations also do not significantly impact on the setting of listed / scheduled structures.
- 8.22 Although not statutorily listed, a number of buildings utilised by our Client within its current site boundary are identified as being of either of local national importance (e.g. the Southern Hardened Aircraft Shelters, Paragon's main office building, A Frame hangers and buildings within the Victoria Alert Complex) due to their positive contribution to the conservation area. As noted above, our Client will continue to maintain these buildings, some of which are proposed for long term retention.

### Landscape and Visibility

- 8.23 The current renewal planning applications are accompanied by a detailed visual assessment carried out by Entec UK Limited, updating their assessment carried out in 2005 which was prepared to support previous (approved) applications to renew temporary planning permission. The updated assessment focuses on day time impacts as in the longer term, night time impacts will be removed in their entirety through the replacement of existing security lights with infra red cameras and a pressure-sensitive underground cabling around the permanent site perimeter. The assessment also focuses on the visibility impacts of existing operations but it does briefly consider the change in visual impacts on existing receptors which would arise from moving vehicle processing operations from the main runway and eastern taxiway.
- 8.24 This updated assessment has re-confirmed the conclusions reached in the 2005 assessment, notably that no receptors currently sustain significant visual effects. Those most greatly affected are located to the north of the site, including users of footpath 13 and residents in Troy Cottages. However, impacts are not considered to be significant due to the distance of the vehicle processing areas from these receptors and the fact that vehicles only make up a small proportion of the view, particularly when considered in the context of buildings on the airbase, the characteristic rolling topography of the area and tree / hedgerow cover. Also, the views available from Troy Cottages are 'private' rather than 'public' views. Although impacts are considered insignificant, through the relocation of vehicle processing operations from the main runway and eastern taxiway, the visibility of vehicles would be further reduced.
- 8.25 Further to the conclusions of the (previous) assessment and negotiations with the Planning Officer in the context of earlier renewal applications, an agreed position has previously been reached where external vehicle processing areas associated with Paragon's currently permitted operations is barely perceptible and in the vast majority of instances, not even a feature in the landscape.
- 8.26 As part of the Environmental Statement accompanying the NOC's planning application, a landscape and visual assessment of the proposed wider redevelopment of the airbase (which proposes a permanent facility for 'vehicle preparation car staging') has been undertaken by the Cooper Partnership.

### Ecology

- 8.27 As with airbase infrastructure, our Client has played an important role since the cessation of military activity in maintaining ecological resources within their site. This role will be able to continue during the temporary period and pending the delivery of a lasting arrangement. Also, Natural England did not raise an objection to the previous renewal applications.
- 8.28 A large part of Paragons's current site lies outside of any defined wildlife site or area of ecological importance. Notwithstanding the fact that our Client has played an important role in maintaining ecological resources as part of their occupation at Upper Heyford, transitional arrangements which may be possible through the proposed further temporary period provides an opportunity to implement changes to the current vehicle processing area footprint to further enhance this position. For example, removal of cars from more sensitive locations, such as that part of the main runway included within an area defined as being of ecological importance.

### Traffic and Transport

- 8.29 As with the extant temporary planning permissions, our Client would be prepared to enter into and actively implement an updated lorry routing agreement to continue to direct HGV traffic away from unsuitable rural roads and nearby villages. Our Client has operated under the provisions of such agreements for several years and has a long standing track record of compliance.
- 8.30 As part of a future permanent facility and in the context of the new settlement and its associated infrastructure improvements, our Client would be willing to prepare and implement / join with a Travel Plan to promote the use of non-car travel modes by its employees.
- 8.31 In addition, and if deemed necessary in the context of these applications, our Client would be prepared to consider appropriately worded conditions to cap, monitor and report on peak hour movements to and from the vehicle staging area.

### Sustainability and Community Benefits

- 8.32 In addition to ensuring the effective utilisation and maintenance of previously developed land and buildings, the retention of Paragon will ensure the availability of a large number of a high quality and diverse range of employment opportunities potentially accessible to local residents. This is key to ensuring a sustainable and balanced long term settlement which will, in turn, provide environmental benefits such as reducing the need to travel, thereby minimising greenhouse gas emissions etc.
- 8.33 In addition to these longer term benefits, it is important to note that our Client already contributes to sustainability objectives with over one third of their employees residing within Cherwell District and with a large number also living within 5 miles of the site and even already resident in Upper Heyford itself. The proposed further temporary period will provide the necessary 'stepping stone' to enable our Client to maintain and enhance their current sustainability benefits.



## 9. Summary & Conclusions

- 9.1 Existing time limited temporary planning permissions relating to Paragon's operations at Upper Heyford expire on 30 June 2008. The current suite of planning applications seek to extend the permitted temporary period by a further 5 years (i.e. until 30 June 2013) and to update personal conditions to reflect the re-branding of the business.
- 9.2 Our Client has been on site for well over 10 years and over this period has operated without issue.
- 9.3 We have assessed in detail our Client's proposals against existing and emerging policy and also in the context of the delivery of the proposed new settlement. Also, further to the previous renewals of temporary planning permission approved in August 2007, and as requested by the Council, Paragon has examined a wide range of options in an effort to seek to minimize the extent of external vehicle processing area.
- 9.4 The proposed 5 year period for the continuation of temporary uses at the site, which reflects the general approach in the adopted Comprehensive Planning Brief ("CBP"), is necessary for Paragon to continue to operate and to consider transitional changes to the current vehicle processing area footprint and enable a move to a permanent site area as an integral part of comprehensive settlement proposals. As summarised at Section 6 and at **Appendix 2**, proposals will not impact on the delivery of the new settlement.
- 9.5 The importance of Paragon to the economy is well known to the Council and has also been specifically recognised by the South East England Development Agency. The proposed further temporary period is essential to secure the continuation of our Client's important contribution to the economy and community.
- 9.6 The wide ranging economic and associated benefits of our Client, together with the commercial needs of the business, should be afforded considerable weight in the determination of current proposals. These considerations are growing in importance in the light of existing and emerging planning policy, including draft PPS4 which promotes a presumption in favour of sustainable economic development. In addition, our Client's business already delivers a number of identified regional and local economic development objectives.
- 9.7 Notwithstanding the local planning policy which supports the principle of Paragon's further temporary retention at the former RAF Upper Heyford pending the development of comprehensive settlement proposals, for completeness current proposals have been assessed against main environmental issues including heritage, landscape, visibility, ecology and traffic considerations.
- 9.8 Proposals will allow Paragon's role of ensuring site security and the maintenance of important airbase infrastructure and environmental resources to continue. The majority of other impacts associated with our Client's existing business, which should be properly assessed in terms of their short-term nature, are relatively minimal in any event.
- 9.9 This being said, where negative impacts are considered to exist, there is potential for these to be reduced over time through the implementation of appropriate transitional changes to the external vehicle processing area. Over the longer term, a permanent facility provided as an integral part of



settlement proposals, will allow measures to be fully put in place to create a lasting arrangement.

- 9.10 In summary, it is considered that allowing the proposed further 5 year temporary period for Paragon would be acceptable in terms of a wide range of planning policy requirements and objectives, is necessary to ensure the continuation of a range of economic and other benefits and, would in no way prejudice new settlement proposals for former RAF Upper Heyford.

**Drivers Jonas**

**June 2008**

