



Historic England

SOUTH EAST OFFICE

Mr Andrew Lewis
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Direct Dial: 01483 252035

Our ref: P00905351

9 July 2018

Dear Mr Lewis

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

**HEYFORD PARK CAMP ROAD UPPER HEYFORD BICESTER OX25 5HD
Application No. 18/00825/HYBRID**

Thank you for your letter of 17 May 2018 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

Upper Heyford is the best preserved Cold War base in the UK. Its national importance is reflected in a number of listed buildings and scheduled monuments across the base, but its heritage significance also has an international dimension, not only because for a long period it hosted the US Air Force, but also for the part it played in a series of major global events. Your Council has designated the whole site a conservation area and this has to-date proved an effective means of managing its overall heritage significance.

Historic England supports your Council's aspiration, as set out in Policy Villages 5, to secure a comprehensive and lasting future for Upper Heyford that seeks to balance local housing and employment objectives against the desirability of preserving the site's extraordinary heritage significance. We have also been encouraged by some of the applicant's proposals to interpret the site for a wider audience in ways that are both engaging and informative.

We have been involved at the pre-application stage with this emerging proposal. Our advice has consistently been that for Historic England to accept new development beyond the indicative areas allowed for it in Policy Villages 5, any scheme would need to have demonstrably minimised harm to heritage significance, for example through appropriate, innovative design, and be capable of securing an ambitious package of public benefits that decisively outweighs any residual harm.



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Although we think the proposed masterplan could be made to achieve the 'comprehensive integrated solution' envisaged in your local plan, we think it still has a long way to go and we are not persuaded that it fulfils the requirements of Policy Villages 5. There would be a high level of harm resulting from a series of highly visible parcels of mostly standardised housing designs and typologies; there is insufficient clarity provided to explain the proposed future of the Christmas Tree; and no justification has been provided for demolition of two A-type hangars or part of the southern bomb stores. Whilst we welcome the principle of a public park and new visitor facilities, the ambition of pre-application proposals for the site has ebbed away, and it is now questionable whether some of the proposed benefits would be sustainable, or capable of being secured.

We remain committed to working with the applicant and your Council to address each of the above concerns. We would hope ultimately to be able to support the scheme but cannot yet do so for the reasons I have set out here. If the criticisms we raise are not addressed, however, Historic England may have to formally object to the grant of planning permission.

Historic England Advice

Significance

Upper Heyford, a former RAF and USAF base, was decommissioned at the end of the Cold War. Its overall significance lies in its ability to convey the scale and nature of one of the main forms of defence during the Cold War to counter the perceived threat from the Warsaw Pact.

Its buildings and their functional relationships with each other, their associated infrastructure and the spaces in between, survive intact across the majority of the site and are of exceptional significance for their coherent illustration of how the base operated and evolved to respond to changing circumstances and technical innovation. There is unintended aesthetic value in the bleak and open character of this military landscape, a chilling reminder of the scale and destructive capabilities of the base, most potently expressed where the vast expanse of grass and tarmac of the flying field is punctuated only by the obliquely-arranged sculptural forms of the Hardened Aircraft Shelters (HASs) and the layering of other military structures visible in the gaps between them.

The phases of the site which date from the Cold War and earlier (including the early C20th RAF base) are designated as a conservation area and there are a number of listed buildings and scheduled monuments across the site.





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Proposal

This hybrid application proposes a masterplan for new development across the site (as outlined in the application description). Principally it includes residential and employment uses, and a new strategy for public access and heritage interpretation.

Under an extant outline permission (10/01642/OUT), the residential component of the base south of Camp Rd is already in the process of being extended, and limited development is being implemented in the Trident, the core of the former RAF-phase base. The current application proposes further new development in these areas, but also encroaches into the southern edge of flying field, which Historic England has long sought to retain unencumbered by new development.

The Heritage Offer

We welcome in principle the proposal for a public park and core visitor destination at the heart of the site. They could provide new opportunities for residents and visitors to experience the historic core of the former airbase and for its significance to be interpreted in a new and engaging way. This aspect of the proposal could count as a public benefit in the application's favour, but to do so we think the application needs to be clearer and more ambitious about what is actually proposed.

A more coherent offer is called for, to flesh out the aspirations highlighted in the Green Infrastructure Study and Heritage Offer documents into a suite of benefits that are capable of being quantified and secured by means of a S106 agreement. For example, will the public park be freely accessible, or controlled in some way? Will it give residents amenity value only (i.e. for dog-walkers etc), or will opportunities be taken to exploit the site's heritage value, too? The initial proposals for this area included an imaginative plan for visitor activities and interpretation, but all that now remains of this appears to be an observation tower and a less ambitious museum offer. We question whether this is now a sustainable model with the capability of surviving beyond the 5 years currently proposed to be funded by the applicant.

We also think that more could be done to connect this park to a network of publically-accessible paths and cycleways to provide a greater degree of public access around the many elements of the site that could quite readily be made open without conflicting with other uses or vehicular routes. A clear public benefit would be access to the runway, for example, and better interpretation of the site more generally. In this respect we don't think the Pedestrian Routes Plan, which shows pathways around the perimeter of the flying field only, goes far enough to maximise opportunities for increased public access and interpretation.

The control tower (grade II) offers one of the few existing vantage points from which the site as a whole can be viewed and understood. It appears to us well suited to





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café/events use and, subject to a separate LBC to cover the detail, this scheme would offer a positive future for that building.

Housing

Our main concern about development on the flying field has always been its likely incongruity with the site's characteristically bleak and open character. This is a particular risk of new housing, especially where its grain, scale, massing and domestic appearance would be starkly and unhappily juxtaposed against the existing distinctly military character.

One possible solution for minimising the harm caused by new housing - which we think is applicable only in peripheral locations - is to form landscape buffers between it and the flying field, e.g. in parcel 10. You should nonetheless satisfy yourself that the indicative buffer in this case would be substantial enough to screen the housing.

However, it would not be possible to screen parcels 11, 12, 21 and 23 in the same way, so the potential for harm to the character of the conservation area in these much more prominent locations is considerable. We have not ruled out the possibility of housing in these locations, but at present we think this housing would result in a high level of harm to the significance of the conservation area, and we therefore advise that you seek considerable further information to satisfy yourselves that the impacts of this development are minimised, in the manner required of you by paragraph 129 of the NPPF.

We strongly advise that if any new development is to be accepted encroaching on the flying field, it needs to be a creative and imaginative response to its context, which we think precludes the mostly standardised housing designs or typologies shown in the design and access statement. Avoiding a suburban domestic character is most important, which we therefore suggest this calls for a higher proportion of apartments grouped together, as opposed to the preponderance of single, detached houses with garages that are currently proposed. We are encouraged that the applicant has identified the most sensitive areas of housing development in specific character zones (Z5 and Z6), but recommend that much more work needs to be done to define how these would be treated. In practice this means that the key design parameters need to be explained and accompanied by sufficient illustrative material to demonstrate how the scheme as a whole is capable of being realised and how its impacts have been minimised. A character study for each zone would then provide a vision for how they are linked and how they relate to existing heritage assets, in a way that could then be formalised through targeted design coding, and assured by a programme of design review.

Identifying the right lead designers is an important part of the process of achieving appropriate design; the current application appears to us to suffer particularly from an



absence of specialist design input.

Employment

New employment uses are proposed principally in the group of HASs known as the Christmas Tree, located towards the SE corner of the site. We think that commercial uses in what are likely to be large metal and concrete sheds are more likely than housing to be of a scale and design that reinforces the existing character, but we again advise that more needs to be done to demonstrate how the proposed accommodation is likely to be provided and what its consequent impacts are likely to be. We would, for example, be concerned if the new structures subsumed the HASs, rather than leaving them detached or lightly linked and with their distinctive forms therefore remaining readable.

Filming could in our view be a beneficial means of bringing benign activity and financial security to the base, and might be helpful in attracting associated creative industries to the site. Existing employment associated with proposed car processing would remain as it exists currently, but on a different footprint, at the west end of the southern taxiway. Its impacts would be broadly comparable with the existing situation, although it would be more visible from the QRA. We suggest that opportunities for appropriate forms of screening along its northern edge should be explored, and the likely visual effects of a range of screening options explored.

There is also potential for harm to the conservation area from the primary school, proposed just north of the southern taxiway. The indicative designs for this school in feasibility work that accompanies the application suggest, however, that it could in fact be an imaginative solution for reusing some of the open-sided sheds in the Victoria Alert and a way of giving them a positive new use. Mechanisms would need to be agreed by condition or as part of a legal agreement to ensure that a design of this quality would be realised, and not a standard, more harmful alternative.

Demolitions

The two A-type hangars of 1925-6 identified for demolition in the Trident are highlighted as positive contributors to the conservation area in the Council's character appraisal of 2006, and are part of the largest collection of such hangars in the country. They contribute to the sense of scale and planned character of the former RAF base. The harm associated with their replacement with mixed-used development and an extra care facility does not appear to be justified anywhere in the application.

If some form of housing development is to be accepted on parcel 23, we think it should seek to minimise loss of the bomb store igloos. It may be possible to do this, whilst still securing the housing numbers allocated in Policy Villages 5, by increasing densities in other parcels, for example in Phase 9 of 10/01642/OUT (current ref: 16/02446/F). We





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have long argued that higher densities should be provided where there is least heritage sensitivity, e.g. to the south of Camp Road, to allow for greater flexibility where there is most.

Policy

This application is made in the context of your Council's Local Plan 2011-31 (Policy Villages 5). This provides for an additional c. 1600 houses, c. 1500 jobs and supporting infrastructure at Upper Heyford. The current proposal extends beyond your Council's suggested areas for that development. The relevant policy is clearly worded to preserve the character of the flying field and development is to be kept back from the northern edge of the indicative development areas.

Because this application proposes new development which steps significantly into the flying field, and beyond the areas envisaged for it in Policy Villages 5, the key heritage issues to consider in relation to this application are the extent to which this departure from policy is harmful to the site's heritage significance and whether any such harm is the minimum necessary to secure the 'comprehensive integrated solution' for the site that Policy Villages 5 envisages.

Historic England has concluded that the harm associated with the scheme would be high, and that a combination of greater ambition and clarity about the vision, likely detail of the scheme and approach to density and demolitions could considerably reduce that harm without compromising an ability to fulfil the requirements of Policy Villages 5. We therefore conclude that the proposed harm is not the minimum necessary to secure the policy objectives.

You are also required by paragraph 129 to seek means of avoiding any harm to heritage significance and that this is required before the balancing of harm against public benefits (para 134) can occur. Paragraph 131 reminds us that development is also capable of positive change and that planning applications should therefore seek to enhance and contribute positively to heritage significance, including to local character and distinctiveness. There would be opportunities to do this through new design which seeks to reinforce the local character, but we don't think that such opportunities have been taken, with the possible exception of the school site.

It can be more difficult to assess the heritage impacts of a planning application when it is proposed in outline rather than in full. However, an applicant is still required to provide sufficient information for the likely effects of the realised scheme to be understood, in accordance with para 128 of the NPPF. It is for this reason that we think seeking further clarity about the design vision and parameters for both the housing parcels and Creative City would be justified.

In addition to all the above policy considerations, a final decision on this application will



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need to be taken in accordance with your statutory obligations for listed buildings and conservation areas contained in sections 16(2) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. Your Council could not be expected to discharge its statutory duty to pay special attention to the desirability of preserving or enhancing the special character or appearance of the conservation area (72(1)) if the demolition of buildings identified by your Council as contributing to the significance of that conservation area were to be accepted without adequate explanation or justification. Harm of any kind to heritage significance needs clear and convincing justification (NPPF, 132).

Historic England Position

Historic England concludes that the current masterplan has the potential to fulfil your Council's policy object of a 'comprehensive integrated solution' for Upper Heyford. However, as currently proposed it would result in a much higher level of harm to heritage significance than is necessary to deliver that solution. We therefore must conclude that this harm is unjustified.

We remain committed to assisting your Council and the applicant to minimise the harm caused and to ensure that the proposed package of heritage benefits would be sustainable and capable of being quantified and secured by means of a legal agreement. Only once these processes have been completed should your Council weigh the residual harm against the benefits in the manner required by paragraph 134 of the NPPF.

This position has been endorsed by the Historic England Advisory Committee.

Recommendation

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 128, 129, 131, 132 and 134 of the NPPF. We think this application is capable of being amended to address our concerns, but were this application to be recommended for approval in its current form we would expect to raise a formal objection.

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

Section 38(6) of the Planning and Compulsory Purchase Act 2004 also requires that you determine planning applications in accordance with the development plan unless





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material considerations indicate otherwise.

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

Please contact me if we can be of further assistance.

Yours sincerely



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