



Historic England

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Direct Dial: 0207 973 3632

Our ref: P00905351

18 May 2020

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 24 April 2020 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Summary

Historic England has previously commented on this application, stating that we had concerns about the proposals, due to their impact on the highly significant Cold War airbase at Upper Heyford. While we could see the potential for these concerns to be addressed, we have previously stated that we would object to the application if they were not. In response to our advice, and that of other consultees, the application has been amended. In addition the applicant has held a design charrette, which has suggested a number of innovative ways of using high quality architectural design to minimise the impact of new housing on the Cold War elements of the conservation area.

While some of the specific changes outlined in the revised application are welcome, particularly the retention of the A-type hanger 315, the application still involves the demolition of a number of buildings that make a positive contribution to the conservation area, most notably buildings 151, 370 and part of the Southern Bomb Stores. The loss of these building would entail a high level of harm to the conservation area which has yet to be clearly and convincingly justified in the manner required of any harm by the National Planning Policy Framework (NPPF).

While the design charrette has generated some very interesting and promising ideas, this process is ongoing and the results have yet to be incorporated into clear and deliverable design guidance that would shape the development of the parcels of land



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involved. We therefore remain to be persuaded that the harm that would be entailed by building on parcels 11, 12, 21 and 23 has been minimised or is justified. Likewise although the slight reduction of the area allocated to the creative city is welcome we do not have confidence that everything possible has been done to minimise and justify the impact of development in this area.

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. We remain committed to working with the applicant and your Council to address each of the above concerns. We still 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 would formally object to the grant of planning permission.

Historic England Advice

In our last letter of 09 July 2018, we explained that Upper Heyford is of national importance as the best preserved Cold War airbase in the UK. While we were supportive of your Council's aspiration, as set out in Policy Villages 5 of the Cherwell Local Plan, of securing a comprehensive and lasting future for the site we considered that the proposals would entail a high level of harm. We were not convinced that this level of harm was justified, or that some of the heritage benefits proposed would be sustainable or capable of being secured.

The nature of the revisions to the submitted application

Revisions to the scheme have now been submitted. These include:

- Building 315, one of the A-Type hangers, is to be retained. The other A-type hanger, 151, is still to be demolished and replaced with housing.
- Building 370, a squadron HQ on parcel 21 associated with the group of HAS which are intended to become the creative city, is to be demolished. This is to allow more scope for freedom in the design approach to this parcel (which is one of those looked at by the design charette) in order to enable a design concept that can respond positively to the cold war character of the site.
- The height parameters plan draws development associated with the creative city back from the southern taxi way in order to lessen the impact of this development on the flying field.
- The proposals for the school have been revised. The existing office block is to be demolished, the extent of new build is to be limited to 2.4ha, the height of new building limited to 10.5m and the fence line adjusted to link the Victoria Alert shelters, which is intended to limit the impact of fencing on the Cold War Landscape. Only one Victoria Alert Shelter will now be included within the school site, the others formerly within the school site (2005 and 2006) are to be





in class D1/2 use with ancillary class A1-5 use.

- The extent of parking for car processing has been altered slightly; most notably more space has been left around the listed nose docking sheds 325, 327 and 328.
- The density of housing on parcel 23 (the Southern Bomb Stores) has been reduced by 40 dwellings. The extent of demolition proposed remains the same. To ensure that the same number of dwellings the density of parcels 11, 12, 21 and a new parcel, 30 have been increased slightly.
- The results of the Design Charrette have not been incorporated into the revised parameter plans as the process is ongoing. Instead the planning statement includes at paragraph 5.48 a statement “that a Design Charrette with inform and set out an appropriate design response for parcels located adjacent to the southern taxiway (parcels 12, 21 and 23)” and that it “is expected that the Design Charrette preferred approach would be incorporated into a set of design principles and parameters that will be incorporated into the s106 agreement.”
- The heritage offer remains largely the same as in 2018. Minor amendments have been made; these include including building 2010 (the Hardened Crews Quarters in the Quick Reaction Area) as part of the heritage tour and moving the proposed heritage centre from building 366 (the Fuel System Building) to 1368 (a Hush House). 1368 was previously earmarked as a potential future technology and escape room. Building 366 no longer forms part of the heritage offer.

In addition the Planning and Design and Access Statements have been updated and Supplementary Environmental Information (SEI) has been submitted.

Housing

Our main concern about development remains the 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.

The Dorchester Group has held a design charrette in which four architectural practices have visited site and presented their ideas for developing parcels 11, 12, 21 and 23. This has been a worthwhile exercise and a number innovative approaches to creating housing that could be sympathetic to the Cold War character of the site were tabled. These ideas need to be developed to test how deliverable and viable they really are.

At present the application has not been altered to take into account the work of the design charrette; instead the revised Planning Statement (section 5.48) promises that a set of design principles and parameters will be incorporated into a section 106 agreement attached to any planning permission granted.



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We do not consider that this promise would be adequate to ensure the conservation of the Cold War character of the site. It is not clear whether the early promise shown in initial design responses can be delivered, or what the design principles and parameters would be. These are vital issues that are central to the future of the base. The design principles and parameters for these parcels should therefore form part of the hybrid application so that they can be scrutinised properly and form an integral part of the scheme to be delivered. We cannot accept the principle of housing development on these parcels unless it can be clearly demonstrated that this can be done in a sensitive way.

Employment

New employment uses are proposed principally in a group of HASs located towards the south east corner of the site. In our letter of 9 July 2018 we expressed concern that the new structures associated with commercial use subsumed the HASs. While the parameter plans have pulled the area of additional development away from the southern taxiway, which is a positive move, the parameters plan still shows these structures potentially entirely surrounded by new buildings up to 18 metres high (the HASs are only 8.3 metres high internally). Our concerns about this group being subsumed by new development therefore still stand.

The new school site

In our letter of 9 July we accepted that initial feasibility work suggested that school use could be an imaginative solution for reusing some of the open-sided sheds in the Victoria Alert Area. Subsequent design development has revealed just how difficult placing a school on this site would be. While a more sensitive way of arranging the fence-line to minimise its visual impact has been arrived at the proposal now only involves the reuse of one Victoria Alert shelter. The school would be housed in a new building which would detract from the military character of the area and major alterations to the hardstanding that links the shelters and gives them context would be necessary to provide the necessary play space for the school. We therefore conclude that placing a school here would, as currently proposed, entail a high level of harm to the significance of this part of the conservation area and that this harm is not outweighed by the heritage benefits of finding a use of a single shelter.

Demolitions

The proposals still involve the demolition of an A-type hanger in the Trident. These 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 an extra care facility does not appear to be justified anywhere in the application.





In our letter of 9 June 2018 we stated that efforts to minimise the loss of bomb store igloos from parcel 23 should be made and that it may be possible to do this whilst still securing the housing numbers allocated in Policy Villages 5 by increasing densities in other parcels. As design work on this parcel is still underway it remains unclear whether the demolition of bomb stores proposed is justified.

It is also now proposed to demolish building 370. This is one of four hardened squadron headquarters which played an important role in operations on the base during the height of the cold war. It is identified as being a positive contributor to the character of the conservation area and of local significance in the Council's character appraisal of 2006 and of national significance in the 2005 conservation plan. Demolition of this structure will therefore need a clear and convincing justification. As the proposals for this site are unclear as yet no such justification has been supplied.

The cumulative impact of the proposals on the significance of the conservation area

We remain of the view that the proposals would entail a high level of harm to the significance of the conservation area. Not only would a number of buildings which make a positive contribution to the area be demolished but housing on the flying field, and large structures associated with the creative city, would inevitably erode its Cold War character of the site. While it may be possible to minimise the level of harm by good design to the extent to which this could be done is not yet clear.

Our view contrasts with the Supplementary Environmental Information supplied with the revised application, which considers the impact the proposals on the conservation area and concludes that they would have a slight to moderate adverse effect, while the impact on historic buildings and landscape of the former RAF Upper Heyford Conservation Area would be Neutral to slight adverse. Interestingly the impact on the Historic Landscape of buildings and landscape of the Rousham Conservation Area is considered to be a moderate adverse effect (more likely slight adverse). That the impact caused by light pollution on a conservation area over a mile away is held to be of a similar magnitude as a major intervention that would involve the loss of a number of buildings making a positive contribution to the Conservation Area, and that would compromise the Cold War character of the site as a whole, suggests that the way in which the impact of the proposals has been assessed is flawed.

One of the reasons for the SEI reaching such a surprising conclusion is that archaeological recording and the heritage strategy are held to be mitigate the impact of the proposed changes and ensure that the residual effects are only slight to moderate adverse. However, these measures do not materially reduce the impact of the proposals, a building which has been demolished is lost forever and while recording is always welcome it is a poor substitute for that loss. Similarly while the heritage offer may include welcome provisions for public access it does not lessen the





harm in itself. In this respect it is essential to avoid the possibility of double counting public access as both a way of reducing harm and then as a public benefit to be weighed against that harm.

The heritage offer and heritage potential

Only minor changes have been made to the heritage offer when compared with the original application and the concerns and questions raised in our letter of 9 July 2018 remain.

You also asked us, in your email of 13th May, to comment on whether the evidence on heritage potential “is fundamentally lacking and inadequate for the approval of the application”. Paragraph 189 of the National Planning Policy Framework (NPPF) states that local planning authorities should require an applicant to describe the significance of any heritage assets affected. The level of detail should be no more than is sufficient to understand the potential impact of the proposal on their significance. The documents supplied by the applicant describe the significance of the airfield in sufficient detail and have been prepared using all the currently available research and documentation available. While we dispute the conclusions that have been reached about the significance of particular elements of the base, and the impact the proposals would have on the significance of the Cold War airfield, we do not consider the descriptions supplied to be inadequate, nor do we believe further research into the significance of the base is necessary in order for this application to be determined.

Planning 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.

Paragraph 193 of the NPPF requires great weight to be given to the conservation of a designated heritage asset, which includes conservation areas. Heritage considerations should therefore be a key consideration when determining this application. Historic England has concluded that the harm associated with the scheme would be high. It





may be possible to reduce this harm through innovative design in parcels 11, 12, 21 and 23; indeed the design charrette is giving encouraging pointers in that direction. But unless design principles to ensure that harm would be minimised are clearly set out as part of the application we cannot have confidence that this objective would be delivered. Furthermore, the scale of development currently envisaged around the creative city would entail a high level of harm to the significance of the conservation area and while drawing back the area covered by this parcel in the parameter plans is welcome we are not convinced that the harm has been minimised here. We therefore conclude that the proposed harm is not the minimum necessary to secure the policy objectives.

You are also required by paragraph 190 to seek means of avoiding any harm to heritage significance and that this is required before the balancing of harm against public benefits (paragraph 196) can occur. Paragraph 192 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. Again the design charrette has demonstrated the potential for this at Upper Heyford, but unless the results of this process are incorporated to the proposals we don't think that such opportunities have been demonstrated to have been taken.

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 paragraph 189 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 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 (LBs and CAs) 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, paragraph 194).

Historic England's current position

Historic England remains of the view 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



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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 196 of the NPPF.

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 189, 190, 192, 193, 194 and 196 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 please treat this letter as 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 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 material considerations indicate otherwise.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, 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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