

18/00825/HYBRID

Heyford Park, Camp Road, Upper Heyford

A hybrid planning application consisting of: • demolition of buildings and structures as listed in Schedule 1; • outline planning permission for up to: > 1,175 new dwellings (Class C3); > 60 close care dwellings (Class C2/C3); > 929 m2 of retail (Class A1); > 670 m2 comprising a new medical centre (Class D1); > 35,175 m2 of new employment buildings, (comprising up to 6,330 m2 Class B1a, 13,635 m2 B1b/c, 9,250 m2 Class B2, and 5,960 m2 B8); > 2,415 m2 of new school building on 2.4 ha site for a new school (Class D1); > 925 m2 of community use buildings (Class D2); and 515 m2 of indoor sports, if provided on-site (Class D2); > 30m in height observation tower with zipwire with ancillary visitor facilities of up to 100 m2 (Class D1/A1/A3); > 1,000 m2 energy facility/infrastructure with a stack height of up to 24m (sui generis); > 2,520 m2 additional education facilities (buildings and associated external DORCHESTER LIVING LTD HEYFORD PARK, UPPER HEYFORD, OXFORDSHIRE ADDENDUM PLANNING STATEMENT March 2020 | PB | P16-0631 Page | 5 infrastructure) at Buildings 73, 74 and 583 for education use (Class D1); > creation of areas of Open Space, Sports Facilities, Public Park and other green infrastructure. • the change of use of the following buildings and areas: > Buildings 3036, 3037, 3038, 3039, 3040, 3041, and 3042 for employment use (Class B1b/c, B2, B8); > Buildings 217, 3052, 3053, 3054, 3055, 3102, and 3136 for employment use (Class B8); > Buildings 2010 and 3009 for filming and heritage activities (Sui Generis/Class D1); > Buildings 73 and 2004 (Class D1); > Buildings 391, 1368, 1443, 2005, 2006, 2007, 2008 and 2009 (Class D1/D2 with ancillary A1-A5 use); > Building 340 (Class D1, D2, A3); > 20.3ha of hardstanding for car processing (Sui Generis); and > 76.6ha for filming activities, including 2.1 ha for filming set construction and event parking (Sui Generis); • the continuation of use of areas, buildings and structures already benefiting from previous planning permissions, as specified in Schedule 2. • associated infrastructure works, including surface water attenuation provision and upgrading Chilgrove Drive and the junction with Camp Road.

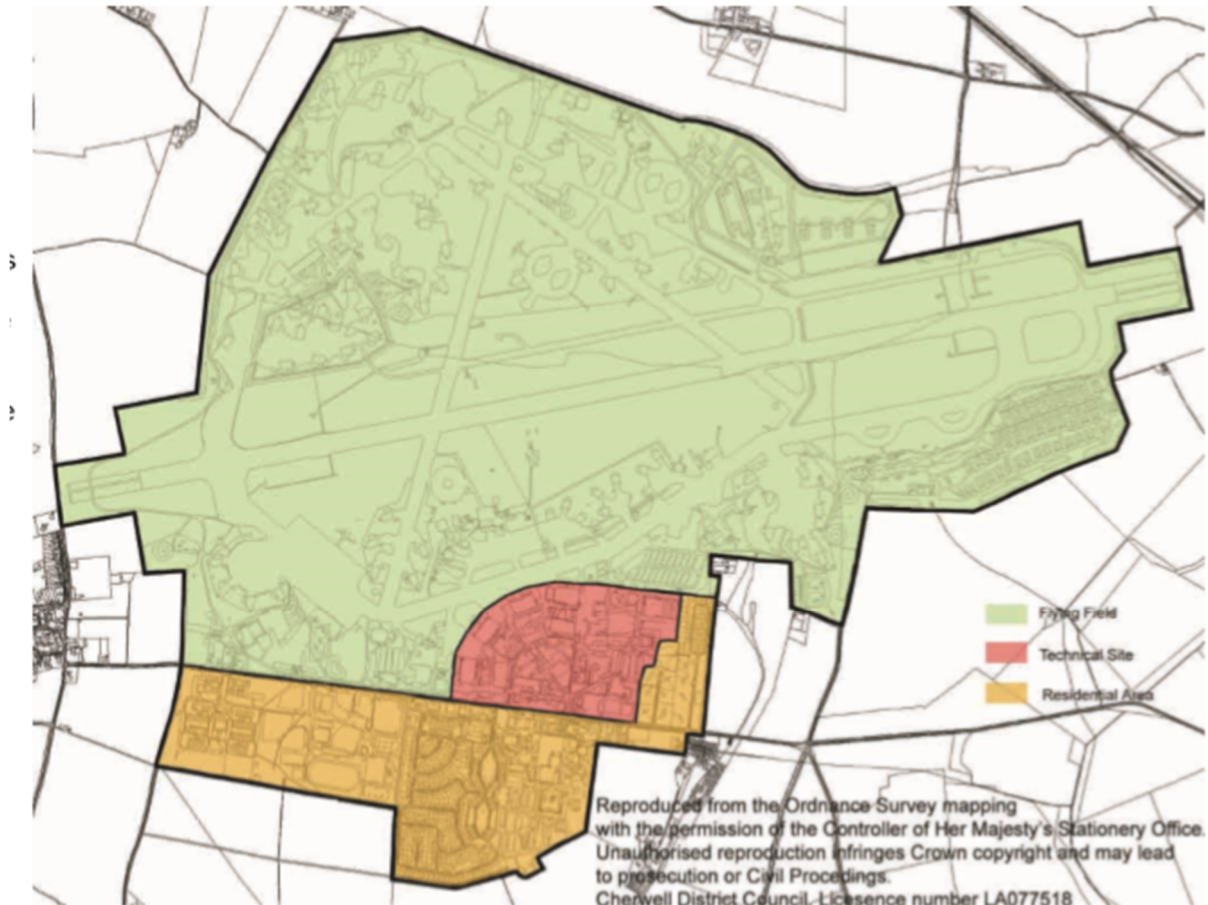
Significance of site and principle of development

RAF Upper Heyford is a cold war landscape with a range of designated and non-designated heritage assets including a conservation area, scheduled monuments (one of which is identified as being of international significance), listed buildings and non-designated buildings of national and local significance.

RAF Upper Heyford has been identified as a mixed used development site within The Cherwell Local Plan 2011-2031 in Policy Villages 5. The policy carefully balances development requirements with the need to preserve the heritage and there is a fundamental principle enshrined within this that there is to be no development on the flying field. The interpretation in the Addendum Planning Statement that development is to be to the southern end of the flying field is incorrect. The intention of the policy is that there was to be no development ON the flying field.

The Mid Cherwell Neighbourhood Local Plan includes Policy PD3 specifically on the Heyford base which states ' A zone of non-coalescence, defined on Policy Map Fig. 18, on the western boundary of Heyford Park shall prevent coalescence of any development proposals at Heyford Park with the

village of Upper Heyford..... Any development which is proposed adjacent to the designated strategic area of Heyford Park (as defined by Local Plan policy Villages 5) should not give rise to coalescence with surrounding settlements, to ensure that their separate identity and character are maintained.



RAF Heyford functional zones. Flying field shown in green.

The character of this area is described in the RAF Upper Heyford Conservation Area Appraisal 'The general character of the flying Field is one of open grassland bisected by runways, taxiways and hardstand. Around the periphery of this open area are strategically located HAS's and areas with specific function, some self-contained within their own securing fencing' and 'The present day character of the flying field has thus been largely determined by the requirements of the strategy of Flexible Response and the F111s ability to threaten the Warsaw Pact's key military installations' .

The layout and stark, open character of the flying field is fundamental to the significance of heritage asset of RAF Upper Heyford. The flying field is of significance as a single entity and it is the functional relationship between the different aspects of the site that is of importance. The southern side of the airfield is of particular significance due to its close physical links with the Technical site and the Domestic Site.

Any proposal to provide built development on the areas not identified by Cherwell Local Plan 2011-2031 Policy Villages 5 will cause a high level of harm to the character and appearance of the RAF

Upper Heyford Conservation Area and the setting of all listed buildings, Scheduled Monuments and non-designated heritage assets in the area. The masterplan has been the focus of an ongoing discussion and refinement in relation to proposed development on the flying field. Concerns have been raised about this general principle at every stage. Many of these changes are reflected in the current document. There remains a fundamental objection to the principle of development on the flying field, but it is acknowledged that compromises have been made and that a degree of harm will need to be accepted, but it is important that this harm is minimised and mitigated. The harm caused will need to be balanced by the public benefits to come out of the scheme.

The following comments are based on the original comments on the initially submitted draft of the masterplan with updates where appropriate.

Specific significant changes to proposed masterplan

Changes to red line boundary

The proposed changes to the red line are generally welcome and have come about following discussions on density and the need to provide housing numbers within the site area as a whole. The buildings now proposed for demolition are (generally) considered to cause less harm to the site as a whole than alternative areas around the site, although this is discussed in more detail below.

Proposed changes in density in individual parcels of land

The proposed change in density around parcel 23 the Southern Bomb Stores is welcome due to the particular sensitivities of this heritage assets in the area. The corresponding increase in density in other areas is considered to be moderate. Consideration should be given to further reducing the density in this area of the site in order to protect the heritage assets and their settings.

Proposed changes to Sports Park location

The proposal is welcome in relation to the sports park itself and will have less of an impact on the setting of the conservation area than the previously proposed site. Consideration will, however, need to be given to the impact of floodlighting in this area though as this will have the potential to impact on the surrounding area.

Detailed comments on individual aspects

Heritage Offer

The proposal to allow public access to RAF Upper Heyford is enshrined within the Cherwell Local Plan Policy Villages 5. In general terms the proposed Heritage Offer, with its central intention of making the site, its significance and its understanding of the Cold War period accessible to a wider audience is positive. This is welcome and forms one of the public benefits of the proposal.

The key concern is ensuring that this aspect of the development is delivered in a timely way and that the general public as well as residents are able to benefit from these proposals at an early stage. This will need to be tied into a legal agreement linked to a phasing plan. It will also be important to

ensure that the agreed condition and review surveys are tied into a legal agreement and works to ensure the maintenance of the buildings are undertaken.

There are, however, some concerns with the proposals within the Heritage Offer document, which are detailed in the comments below.

Heritage Centre and heritage tours

There are no objections to the re-location of the Heritage Centre to a more central area of the site, provided the existing provision remains until the building is ready.

The additional, less specialist heritage tours are welcome.

Control Tower Park and Flying Field Park

There is considered to be a **public benefit** to allowing greater informal public access to the heritage asset. It is, however, fundamental to the significance of the heritage asset that the existing 'stark, functional character' is retained.

The Design and Access Statements claims that 'The park will be an informal landscape and include a range of amenities and facilities for casual and informal use by visitor and the parkland and commercial community'. The landscaping details are of fundamental concern and details will need to be submitted at an early stage of any reserved matters application. The **public benefit** of access to the airfield could be outweighed by **harm** if the landscaping details are inappropriate for the context. Particular attention should be paid to the relationship with other areas of the site and any associated boundary features.

There are concerns with the proposed 'Observation Tower' which it is noted will be up to 30m in height. This will potentially have an impact on surrounding heritage assets (including Rousham Park) as well as the airfield itself. The original proposal was to have the tower on the runway itself, but following comment during the pre-application process it has been moved slightly to the south of the runway, but is still considered to be in too close proximity and will cause harm to the understanding of the function and layout of the airfield runway. Further information will be required at reserved matters stage on the design of the tower. It is understood that a survey has been undertaken assessing the impact on the surrounding area of the proposed tower at different heights – this should be utilised to inform the design and height of the tower and should be included as part of any forthcoming application. Part of the justification for the proposed observation tower is that it will bring additional tourism to the area and will provide greater access to the parks – this will need to be demonstrated and justified within any forthcoming reserved matters application.

The proposal to use the Control Tower for public access is welcome subject to details. A full listed building consent application will be required which assesses the significance of the Control Tower and puts forward a comprehensive programme for the refurbishment and conversion of the building which retains the core significance. A key consideration will be the provision of a staircase to provide public access to the upper floor. A listed Control Tower at Greenham Common has been converted to a café and event space and this may set a useful precedent. Careful consideration will need to be

given to the landscaping around the Control Tower with particular reference to parking and lighting. Also need to consider how to address the blast wall that is currently in place.

Views from the Control Tower should be carefully considered in relation to other developments on site, ensuring that the character of the site is maintained from this viewpoint.

Core Visitor Destination Area

The proposal to provide further public access to the site within the Core Destination Area is generally welcome and seen as a public benefit. There are concerns that this area of the park should be included within a legal agreement to ensure that this aspect of the development is undertaken in a timely manner. Clear uses will be required for these buildings. The public benefits of the opening up of the site should be provided at an early stage in the development and should be controlled by a phasing plan and legal agreement.

The buildings in this area include a former Hush House (building 1368), a former Engine Test Cell (building 1443) and five open sided aircraft hangars (buildings 2005-2009), which all lie within the Victor Alert area. The buildings are non-designed heritage assets and identified by the Heritage Impact Assessment as being of medium significance.

The open sided aircraft hangars are by their nature large, open spaces and are eminently convertible without losing their core significance. The key area of concern is to find suitable, sustainable uses for the buildings. The Design and Access Statement indicates potential uses for the buildings to include Heritage Centre, Exhibition Space, Science and Technology Hub (including code breaking escape room) and Adrenaline Park to include stake park, climbing wall and public seating area. There would be no objections to these uses.

A key consideration will be the impact of any proposed development on the relationship between the buildings including parking, lighting, landscaping etc. This is of particular importance in relation to building 2004 which will form part of the school site. Any development in this area will need to take consideration of the military character of the site. Overdevelopment of the areas around the buildings could cause **harm** to their setting and the character and appearance of the conservation area. A strategy will be required to deal with all these elements on site to ensure an appropriate form of development. Detailed consideration will need to be given to the relationship between the Core Visitor Destination Area and the school site.

Educational Site

There are longstanding significant concerns with the proposal to site the school in this location. There are particular concerns with its relationship to the taxiway, the runway and the aircraft hangars; as well as its relationship with the wider development.

The original intention was to incorporate the school buildings within the aircraft hangar buildings, and this would have been welcome, but this was not acceptable from an educational point of view. Additional design work has been undertaken on the proposed school in this location and on the whole this has demonstrated the unsuitability of the site. The required educational needs on the school site cause high levels of harm to the setting and surrounding context of the airfield.

The design document produced in May 2020 raises particular concerns as it refers to alterations to the aircraft hangars which now lie outside the school site and the potential for future expansion of the school. This would lead to unquantifiable additional harm to the aircraft hangars and their setting as well as the wider context of the site.

The actual design of the school building is not included within the design work and this is another area of significant concern.

It should be a fundamental principle that the aircraft hangars are to remain on site and consideration needs to be given to how this can be achieved now that it is proposed that the buildings are proposed to lie outside of the school site. A management regime will be necessary and consideration to how the school and the building occupiers / owners liaise and who is responsible for which elements of the building.

The indicative designs for the proposed school site is considered to cause a high level of harm to the character and appearance of the conservation area. It would be preferable for an alternative site to be found for the school. Alternatively, a more flexible approach including sharing facilities with the existing Heyford Free School and / or utilising play areas outside the boundary of the school (potentially within the Flying Field Park or former taxiway) would help to mitigate many of the elements of concern.

Any development on the site for a school will require a management agreement for the retention, maintenance and use of the aircraft hangars and conditions detailing parking, lighting, boundary treatments, surfacing, playground / sports pitches.

Mixed Use (Health Centre), Parcel 20

The proposal is to use this site, which is located between two A-frame hangars, for a health / medical centre. The previous proposal involved the demolition of hangar 315 for this use and it is welcome that the hangar will now be retained.

The Design and Access Statement claims the 'character of this zone will be similar to the Village Centre and will be contemporary in style'. The development of the site will need to pay careful consideration to the setting of the surrounding buildings including the A-frame hangars as well as the Scheduled Monument of the hardened Battle Command Centre to the north of the site. The current proposal is extremely indicative and it is difficult to assess the impact on the surrounding heritage assets.

Residential development – outside of Policy Villages 5 allocation

It is understood that there is concern by the developers that it is not possible to get the quantum of development required by Policy villages 5. Nevertheless there are substantial concerns with the proposal for residential development on the flying field and this is seen to be entirely contrary to Policy Villages 5 'The potential development areas shown within Policy Villages 5 are not large enough to provide for the required amount of development'. This issue needs to be addressed through looking at densities.

The proposal to provide domestic dwellings on the former flying field will cause **a high level of harm** to the character and appearance of the conservation area and the setting of scheduled monuments, listed buildings and non-designated heritage assets. Work has commenced on looking at how the harm caused by residential development in these areas can be mitigated through appropriate design. A design charette process has commenced and there have been some promising developments, however the initial ideas which have been brought forward have not yet been worked up into a developable scheme. It is considered that the given the level of harm to the heritage assets and the fact that this is a hybrid application that the work undertaken for the design charette should be included in this application and therefore made publically available.

In addition to concerns about the principle of housing development in this location and the design of any such housing there are significant concerns about the proposal to demolish a substantial number of the southern bomb stores. This will cause **substantial harm** to the character and appearance of the conservation area.

The Heritage Impact Assessment identifies that the phased plan of the southern bomb stores shows that those proposed for demolition are early in date and relate to the 1950-1962 phase of the 'First Cold War'. The igloos of this form have doors on hinges. The bomb stores along the frontage of the flying field are of 1980s date and relate to the 'Second Cold War'. The igloos of this form had a chain operated sliding mechanism for the door.

There are concerns that the demolition of a small number of bomb stores will have an impact on the wider setting of the remaining bomb stores.

A number of options brought out through the Design Charette included the retention and conversion of the buildings proposed for demolition or alternatively building forms that replicated the bomb stores. In some cases this related to reduction in density in this area and a corresponding increasing in other parcels. A robust justification will be required for why it is not possible to retain these remaining bomb stores.

Employment uses

Creative City

The proposal to find a new use for the Hardened Aircraft Shelters for the 79th Squadron around the 'Christmas Tree' to the south west of the site was generally welcomed at pre-application stage. The proposal to adapt the structures for use by high tech creative industries was supported. It was considered that there would be a **public benefit** to finding a sustainable new use for these buildings. It was understood that there would be a need for some extension to these buildings in order to make them viable for use.

It is appreciated that the buildings will remain and that in the proposed arrangement the central space would be retained. The proposed footprint of the extensions to the buildings outlined within the application, however, suggest a scale that will completely dwarf the existing buildings and will cause **substantial harm** to the setting of the buildings. It is appreciated that there has been a slight reduction in buildings heights for the proposed new build in this location, but this is not considered sufficient to mitigate concerns. The proposed footprint and massing of the proposed extensions are still considered excessive and will have a detrimental impact on the original buildings and the setting

of the flying field. The application for extensions of this scale cannot be supported from a conservation perspective. It should be noted that the principle of conversion and extension is potentially acceptable subject to amended and further detailed plans.

Filming area

The proposal for filming on the airfield in the two separate areas identified on the masterplan is welcome. Filming has previously taken place on the site, based on limited timescales, although has never been formally authorised.

A form of management agreement will be required to ensure that filming activity on site does not damage historic fabric and this should be conditioned as part of the application. There are, however, concerns with the proposal to provide 'temporary set construction' along the taxiway. There is concern that any 'temporary' development in this location could become semi-permanent and would have a detrimental impact on the surrounding heritage assets. An alternative location in the hardstanding around the 'Creative City' Christmas Tree should be considered. If this element is absolutely essential to the viability of Creative City any temporary structures should be very tightly controlled by condition / management agreement which should relate to nature of construction as well as numbers of days per year. Consideration will also need to be given to the impact of floodlighting for filming.

Car processing

There is a long-standing planning permission for the processing of cars on RAF Upper Heyford. This has an existing detrimental impact on the character and appearance of the conservation area, the setting of listed buildings and non-designated heritage assets. There is, however, no long term physical impact on the historic fabric of the area.

The proposed re-location of the car processing operation will have cause **additional harm** as it will have a greater visual impact on the surrounding landscape (as the cars will be located in closer proximity to open countryside). There will also be an impact on the setting of the Control Tower Park and Flying Field Park which will reduce the visitor experience of the airfield.

It is, however, recognised that this existing use needs to be located somewhere on site and this needs to be balanced against other uses on site. It is acknowledged that the impact on the listed nose docks sheds is less than previously proposed.

The Masterplan suggests some potential screening, but this is not detailed within the application. Further details would need to be sought as any bund or screening could be just as damaging to the character and appearance of the airfield as the cars themselves.

Conversion of buildings

There are no objections to the conversion of existing buildings to alternative uses. This is considered to be a benefit of the application to find sustainable new uses for the former RAF buildings. Further details may be required in a reserved matters application for issues relating to parking, lighting, boundary treatments and signage.

Demolition of buildings

There are a large number of buildings proposed for demolition as part of the application as a whole. A Heritage Impact Assessment has been provided for some of these buildings. This is welcome, but there are concerns that there may be buildings of significance not covered by these HIAs.

Building 151 / Parcel 19 – aircraft hangar 1920s

Building 151 (an A Frame hangar) is proposed for demolition in order to provide space for creation of extra care units. It is appreciated that previously building 315 was also proposed for demolition and that this is now being retained.

These aircraft hangers form part of a grouping of 6 which are described in the RAF Upper Heyford Conservation Area Appraisal as being unique in their survival and are the largest collection of interwar period end opening airplane sheds in the country. Consideration should be given to similarly retaining building 151 to allow this part of the Technical Site to retain its integrity. The potential to convert these buildings to an alternative use should be considered. The creation of a modular building or pod within the existing structure would not undermine the significance of the building.

Building 370, Parcel 21 – Squadron Headquarters for 79th Squadron

This building was previously to be retained in office use as part of the initial masterplan application. There was a verbal agreement that this building could potentially be demolished in order to safeguard other areas of significance, but this was prior to the production of the Heritage Impact Assessment document which indicated that the building was of greater significance than previously thought.

The significance derives from the fact that the building has a functional relationship with the surrounding Hardened Aircraft Shelters and was of specific design including 'hard' and 'soft' areas. The RAF Heyford Conservation Area had identified it as a non-listed building of local significance', but the Heritage Impact Assessment accompanying this application and the Conservation Plan of 2005 identify the building as of 'high' significance.

One of the options in the Design Charette allowed for the retention of this building in association with a retired living quarter. This option should be given serious consideration.

Parcel 39 (including demolition of buildings 549 and 572)

The two buildings proposed for demolition in this area are the former chapel and associated building, now in use as a community centre. The buildings date to the post war era and do not relate to the cold war phase of the airfield. The buildings are not specifically mentioned in heritage documents relating to the airfield.

There was a verbal agreement that these buildings could go in order to safeguard other areas of significance, but a clear public benefit argument needs to be made for these structures. Any housing on the site would need to reflect the character of the surrounding housing (airmen's bungalows)

Parcel 40 (building 133)

The buildings proposed for demolition are the former Main Store and Church building in 1920s expansion of the airbase. Facility for storage of non technical items such as clothing and small scale technical items including aircraft components. The building had a characteristic shape similar to the guardhouse with receiving doors into each bay with roller shutter arrangement. The building has been radically changed and is not considered to be of any architectural interest.

The building does not make a significant contribution to the character of the conservation area as it does not relate to the cold war phase of development and the building has previously been given consent for demolition.

The layout of the surrounding area with its radiating avenues, is however considered to be of significance and any housing development on the site will need to ensure that the essential form and layout is replicated. The setting of the scheduled Telephone Exchange will also need to be taken into account.

Setting of individual buildings

The Heritage Impact Assessments include a consideration of the setting of the Nose Docking Sheds in the proposed Car Processing parcel 25 (which is included in the section on Employment Uses above). Whilst this is welcome a similar analysis has not been undertaken in relation to other designated heritage assets within the proposed masterplan area. This leads to an inconsistent approach and makes this hybrid application difficult to comprehensively assess.

The setting of designated heritage assets will need to be comprehensively considered in the forthcoming reserved matters applications for the individual parcels of land.

Impact of traffic, movement and connectivity across the site

There are some concerns regarding proposed movement and access across the site.

There are no particular concerns with the use of areas (including the runway) for limited vehicular and particularly pedestrian traffic as the impact on historic fabric is not considered to be significant. The key issue is the subdivision of uses and the control of movement. There are, however, concerns about the proposed use of the crossing of the runway for HGV access the accumulative impact this could have on the fabric of the runway. The layout and access shows only a very indicative outline of the proposed route and therefore the full impact on historic assets cannot be assessed.

The physical requirements for signage, road markings, boundary treatments and highways requirements could have a significantly detrimental impact on the character and appearance of the RAF Heyford conservation area and the setting of heritage assets. This could potentially amount to **substantial harm**. Further details are required in order to be able to assess these impacts.

The Design Charette work has also included some work on the proposed use / design of the taxiway in the area adjacent to the proposed residential. This will need careful consideration and should be specifically conditioned within any forthcoming consent.

Impact of boundary treatments across the proposed development

It is welcome that a proposed plan for the treatment / type of boundaries across the site has been produced. This shows where existing fences are to be retained and removed and where there will be new fences erected. The design and type of fence will be of fundamental importance to both retaining the character of the airfield and to providing a suitable living and working environment.

A boundary treatment strategy will need to be agreed at an early stage of development and should be done as a comprehensive package. This could potentially be conditioned, but would need to be delivered at an early stage of development.

Impact on heritage assets outside the application boundary

The Heyford Masterplan has the potential to impact on heritage assets at some distance from the site. There are two particular concerns the visual impact and associated settings issues and the impact of the additional traffic associated with the development.

The Landscape and Visual Impact Assessment document identifies a number of viewpoints from around the Cherwell Valley which face towards Heyford Park. This includes a number of heritage assets including views from a number of conservation areas.

The key heritage asset of concern in this location is Rousham Park, which in addition to its grade I listed building and Registered Park and Garden is designated as a conservation area due to its designed landscape associated with William Kent. The Rousham Park landscape is of international significance as a largely unaltered example of the first phase of the English Landscape Design in the Picturesque tradition. Viewpoint 16 deals with Rousham Park (from the Dying Gladiator statue) and concludes that whilst the sensitivity is high the overall magnitude of change is negligible.

The Rousham Conservation Area has been re-appraised since the application was submitted and this identifies 10 key views which are considered to be of core significance. Given the significance of the heritage asset and the sensitivity of the visual receptor it would be useful for the Landscape and Visual Appraisal exercise to be conducted on the 10 identified views to include a consideration of seasonal variation and night time views with particular reference to light pollution.

There are also concerns about the potential impact from increased traffic created by the new development on heritage assets in the surrounding area. This relates to the physical impact on historic buildings lining routeways from changes in the environment (additional pollution, water penetration, salt run off etc) as well as the visual impact of any proposed traffic calming measures (signage, traffic management, bollards, traffic islands etc) on conservation areas and the setting of heritage assets.

There is a significant concern about the impact of additional traffic on Heyford Bridge, a grade II* listed structure which is of medieval origin, but was also associated with the designed landscape surrounding Rousham. The bridge is currently vulnerable to modern traffic and is managed by a traffic light system allowing one way traffic only. There have been a number of knocks and traffic accidents along the bridge and there have been a range of modifications and patch repairs over time. A comprehensive repair and ongoing maintenance programme is required and consideration needs to be given to imposing a weight limit to reduce physical impact on the bridge.

Conclusion

The Heyford Masterplan application is an extremely complex application dealing with a wide range of issues. The hybrid nature of the proposed application makes the impact of some elements of the scheme difficult to assess.

It is appreciated that a significant body of work has taken place since the application was initially submitted to help rectify this. In particular the Heritage Impact Assessments have been very useful, although not having these from the outset has caused some problems with discussions which have taken place throughout the process. There are also concerns that buildings not included within the Heritage Impact Assessment process have not been comprehensively assessed and their significance has not therefore been fully considered.

The design work which has taken place on the school site has emphasised the unsuitability of the site for standard educational use. The standards and requirements for the educational provision are very difficult to achieve without causing harm to the character and appearance of the conservation area – unless a more flexible approach (perhaps utilising space outside the school grounds for recreational use or sharing some facilities with the existing Free School on the site) can be agreed. There are also concerns about the future of the aircraft hangars which now lie outside the school site.

By contrast the initial design work undertaken on the proposed additional residential development on the southern end of the flying field has demonstrated that the harm caused could potentially be mitigated by an appropriate design response, but this needs to be demonstrated through additional work.

There are elements of the proposed development which will undoubtedly cause **a high degree of harm** and this will need to be weighed against the public benefits of the development including the provision of increased public access to the heritage site. Further work on discrete areas of the site including the reduction of the footprint and massing of the proposed extensions at Creative City and the retention and re-use of the southern bomb stores and buildings 370 and 315 would make the proposed masterplan far more acceptable.

There are however also concerns about accumulative harm particularly in relation to the areas between buildings. Further details will be required at an early stage relating to boundary treatments, lighting, signage, landscaping, parking, vehicular movement, use of hardstanding.

It is fundamental that any public benefits from the proposed scheme (including restoration of buildings, public access to and interpretation of the site) take place at an early stage. A phasing plan will be required to ensure that this takes place at an appropriate stage of development.