

**FULL PLANNING APPLICATION FOR THE
CONTINUED USE OF THE EASTERN PART OF THE
SOUTHERN TAXIWAY FOR USE IN CONNECTION
WITH ESTABLISHED AND LAWFUL CAR
PROCESSING OPERATIONS**

PLANNING AND HERITAGE STATEMENT

LAND AT CAMP ROAD, UPPER HEYFORD

ON BEHALF OF PARAGON FLEET SOLUTIONS LTD

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

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1. INTRODUCTION

1.1 This Planning Statement has been prepared by Pegasus Group on behalf of Paragon Fleet Solutions Limited ("the Applicant" – hereafter referred to as "Paragon"), in support of proposals for the continued use on a temporary basis of the eastern part of the southern taxi in connection with the established and lawful car processing operations at Land at Camp Road, Upper Heyford ("the application site").

Background to the planning application and the Proposed Development

1.2 Planning permission was granted on 16th May 2014 for the change of use of the eastern part of the southern taxi way for use in connection with the established and lawful car processing operations at Upper Heyford (application ref: 13/01599/F).

1.3 The planning permission was granted on a temporary basis and requires the use to cease and the land to return to its former condition on 16th May 2019.

1.4 However, there remains an ongoing operational requirement for the land on a temporary basis and the continued use of the land for this purpose is proposed for a further 3 years until 31st December 2021.

1.5 A detailed description of the proposed development is provided in Section 3 of this Statement.

The Purpose and Content of the Planning Statement

1.6 This Planning and Heritage Statement identifies the planning policy framework within which this planning application should normally be considered. It identifies the key planning issues that will need to be assessed during the application process having regard to the site and its circumstances.

1.7 The statement is structured as follows:

- **Section 2** – provides a brief introduction to the Applicant;
- **Section 3** – describes the application site and its surroundings;
- **Section 4** – identifies the relevant planning history to the consideration of the application;
- **Section 5** – outlines the application proposals in more detail;

- **Section 6** – sets out the relevant planning policies and guidance;
- **Section 7** – identifies the main economic considerations;
- **Section 8** – undertakes a planning assessment of the proposal including heritage considerations; and
- **Section 9** – provides a summary and the overall conclusions.

2. THE APPLICANT

- 2.1 Paragon Fleet Solutions Ltd is part of the BCA Group which is a company that operates across every link of the post-factory automotive value chain, offering a range of linked services throughout the lifecycle of a vehicle lifecycle. The Group provides comprehensive vehicle management services to OEMs and fleet owners and facilitates efficient changes in ownership between all types of vendors and buyers throughout the typical 12 to 15 year life span of a vehicle.
- 2.2 Remarketing services are at the core of the Group's business model, managing vehicle transactions between vendors and buyers.
- 2.3 Supply is generated from a wide range of customers who use auction as their primary disposal channel and who appreciate the transparency, efficiency and liquidity provided by BCA. Vendors include OEMs, car dealerships, rental, contract hire, leasing and finance companies.
- 2.4 BCA is the largest vehicle remarketing company in Europe and processes more vehicles than any other companies. In the UK, BCA auctions more vehicles than all the other vehicle auction companies combined.
- 2.5 In the last 12 months, BCA has processed 305,000 vehicles through their 12 fleet solution's sites across the UK. The company stores more vehicles than anyone else and has the largest de-fleet and refurbishment capability in the UK – as at 1st April 2018 BCA had 200,000 vehicles on their estate.
- 2.6 Their customer base includes:
- OEM's including Mercedes Benz, Renault, Nissan GB, JLR, Volkswagen Group (all brands), Tesla, Ford, Volvo, BMW, Dacia, Infiniti, BYD, Mitsubishi, Vauxhall, Suzuki, Kia and Smart;
 - Leasing/Rental including Hertz, Europcar, Avis, Enterprise, Scot Group, Arval, ALD, Zeneth, Immotion and LIDL; and
 - Deal Groups including Sytner, Jardine's, Harewood's, Citygate, Tollbar and Alan Day.
- 2.7 At a local level, the Paragon site at Upper Heyford currently employs approximately 600 people and in the last 12 months 55,267 demonstrations, PDIs and vehicle de-fleets have been completed at the facility.

3. THE APPLICATION SITE AND ITS SURROUNDINGS

- 3.1 The application site forms part of the Former RAF Upper Heyford (which extends to approximately 520 hectares in total) together with agricultural fields in the immediate locality. The former RAF Upper Heyford Site was a military airbase owned by the Ministry of Defence that was leased by the United States Air Force from the 1960s until the military vacation of the base in 1994.
- 3.2 The site is located approximately 7km north-west of Bicester, 13km south-east of Banbury and 3km south-west of Junction 10 of the M40 Motorway, in Oxfordshire, lying within the administrative area of Cherwell District Council (CDC).
- 3.3 The former airbase, as a whole, was designated as a Conservation Area in 2006, reflecting the role that the airbase played in the Cold War years, and its associated military architecture and layout.
- 3.4 In addition to its designation as a Conservation Area, the wider RAF Upper Heyford site also contains a number of Scheduled Monuments identified as 'Cold War Structures' and five listed buildings as noted in the 'RAF Upper Heyford Conservation Area Appraisal' produced by CDC in 2006. It is however important to note that none of these designated structures are located within the boundary of the application site.
- 3.5 The application site itself comprises 7.39 hectares of land within the former airbase on the eastern part of the southern taxi way. The site is used in connection with the established and lawful car processing operations at Upper Heyford which extends to just over 16 hectares.
- 3.6 The car processing and application site are located outside the core historic area, in the least significant part of the site overall and largely concealed from public views.

4. RELEVANT PLANNING HISTORY

The Lead Appeal

- 4.1 Planning permission was granted at Upper Heyford by the Secretary of State (SoS) for a new settlement of 1,075 dwellings, together with associated works and facilities, including employment uses on 11th January 2010 (appeal ref: APP/C3105/E/08/2080594 and others).
- 4.2 The Inspector appointed to consider the Inquiry Appeal reported in July 2009. With regard to vehicle processing, the Inspector concluded that subject to constraints in relation to the western part of the vehicle processing areas, the appeal proposals would provide a balanced and lasting solution for the airbase that was generally consistent with the Structure Plan. The Inspector therefore recommended that Planning Permission and Conservation Area Consent be granted.
- 4.3 The SoS duly allowed the appeal in January 2010 subject to, inter alia, a condition¹ amending the Lead Appeal scheme to modify the extent of the parking area for massed groups of cars with a view to achieving some amelioration.
- 4.4 The Planning Permission and Conservation Area Consents granted permission by the Secretary of State authorised the use of 17 hectares of the flying field, mainly hardstanding, consisting of the former runways and taxiing areas with specified buildings for car processing. Car processing was defined as the inspection, valeting, washing, repairing, tyre replacement, processing and delivery of cars and other processing activities that may be required from time to time.

The 2014 Temporary Consent

- 4.5 As noted in Section 1 and of relevance to the consideration of this application, planning permission was granted in May 2014 for the change of use of the eastern part of the southern taxi way for use in connection with the established and lawful car processing operations (application ref: 13/01599/F) authorised by the planning appeal decision discussed above.
- 4.6 The permission allowed the operator at the time, Paragon Fleet Solutions, to undertake revised arrangements for car processing at Upper Heyford to maintain

¹ Condition 44 of the Lead Appeal stated no vehicles to be parked, stored or stage as part of the vehicle preparation and car processing use to the west of the "dog-leg" line drawn from the south-east corner of Building 337 to the north-west corner of Building 350.

on a cost effective basis the capacity of the site to manage a total of 6,000 vehicles.

- 4.7 The permission was however only granted on a temporary basis and the use is required to cease and the land to return to its former condition on 16th May 2019.

The Hybrid Application

- 4.8 A hybrid planning application was submitted to CDC in May 2018 and is currently under consideration (application ref: 18/00825/HYBRID). This application seeks permission for a mixed use scheme comprising of new build residential, commercial and community/retail use development but also for the continuation of use of areas, buildings and structures already benefiting from previous planning permissions – i.e. the established and lawful car processing operations operated by Paragon.
- 4.9 As part of the hybrid application it is recognised that the hardstanding is operated by an ongoing operational business. The location and extent of land associated with car processing is however proposed to be altered from the current lawful area although the total area will remain at 20.3 hectares.
- 4.10 The hybrid application is currently under consideration and it is anticipated that a decision will be made in early 2019. The future reorganisation of land at Upper Heyford, in particular for car processing, will provide a long-term solution for the operations carried out by Paragon, and is therefore a material consideration in the determination of this further application for temporary permission.

5. THE PROPOSALS

- 5.1 The proposals seek planning permission for the continued and extended use of the eastern part of the southern taxiway in conjunction with the established and lawful car processing operations at Upper Heyford.
- 5.2 This application seeks a further temporary planning permission for a period up until 31st December 2021.
- 5.3 The continued use of the land, as extended, is required by Paragon as part of their operational requirements at Upper Heyford. This would only be a temporary arrangement while the hybrid planning application is considered by the Local Planning Authority and then implemented in an agreed phased manner by Dorchester where, as part of those wider and comprehensive proposals, an amended long-term solution for car processing operations at Upper Heyford is proposed.
- 5.4 The area the subject of this new temporary planning application will allow the processing of approximately 2,984 vehicles which when combined with the areas currently used will provide an operational capacity of approximately 8,000 vehicles.
- 5.5 The continued use will operate in the same way allowed by the current temporary planning permission and would not involve any changes to the hardstanding area and nor would it introduce any new lighting. All vehicles would continue to be parked on the existing hardstanding areas within the application site.

6. THE PLANNING FRAMEWORK

6.1 This section refers to relevant national planning policy and Development Plan policies that provide the policy framework pertinent to the planning application under consideration.

National Planning Policy

National Planning Policy Framework

6.2 The revised **National Planning Policy Framework (NPPF)** was published in July 2018 and came into immediate effect. The NPPF sets out the Government's overarching planning policies for England.

6.3 **Paragraph 11** sets out that at the heart of the NPPF is a presumption in favour of sustainable development. The paragraph then defines what this means for plan making and decision taking purposes. With regard to decision taking Paragraph 11 states:

"For decision taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed²; or

ii any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

6.4 **Section 4** of the NPPF '**Decision Taking**' states at paragraph 38:

"Local planning authorities should approach decisions on proposed development in a positive and creative way.....Decision-makers at every level should seek to approve applications for sustainable development where possible.'

6.5 Of particular relevance to this application is **Section 6** of the NPPF '**Building a strong, competitive economy**'. **Paragraph 80** states:

² Footnote 6 states that the policies in the Framework that apply to this point include those relating to designated heritage assets.

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.”

6.6 **Section 9 – ‘Promoting sustainable transport’** recognises that transport policies have an important role to play in facilitating sustainable development. Whilst the transport system needs to be balanced in favour of sustainable transport modes the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. **Paragraph 109** identifies that development should only be prevented or refused on transport grounds where there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be “severe”.

6.7 **Section 16** of the NPPF **‘Conserving and enhancing the historic environment’** states at paragraph 193:

“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more impact the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

The Development Plan

6.8 The extant Development Plan comprises the:

- Cherwell Local Plan 2011-2031 Part 1 (adopted 20th July 2015); and
- Cherwell Local Plan (adopted November 1996)³.

6.9 CDC is in the early stages of preparing their Local Plan Part 2: Development Management Policies and Sites. The Local Plan Part 2 is to conform to the strategic

³ Only those policies saved by the saving direction issued by the SoS and which have not been subsequently superseded by the adoption of the Cherwell Local Plan 2011-2031 Part 1.

policies and overall development strategy set out in the Local Plan Part 1 and will cover the same time period, 2011 to 2031.

Cherwell Local Plan 2011-2031

6.10 The Development Plan comprises the policies of the adopted **Cherwell Local Plan 2011-2031** (adopted 20th July 2015). The relevant policies from the adopted Local Plan are considered below.

6.11 **Policy PSD 1: Presumption in Favour of Sustainable Development** states that the Council will take a proactive approach to reflect the presumption in favour of sustainable development as contained in the NPPF, work proactively with applicants to jointly find a solution and to secure development that improves the economic, social and environmental conditions of the area. Furthermore, that the Council will approve applications that accord with the policies of the statutory Development Plan without delay unless material considerations indicate otherwise.

6.12 **Policy Villages 5 (Former RAF Upper Heyford)** specifically allocates this 520 hectare site for, inter alia, a settlement of approximately 1,600 dwellings (in addition to the 761 dwellings (net) already permitted).

6.13 **Policy Villages 5** sets out the description of the allocation as:

“This site will provide for a settlement of approximately 1,600 dwellings (in addition to the 761 dwellings (net) already permitted) and necessary supporting infrastructure, including primary and secondary education provision and appropriate community, recreational and employment opportunities, enabling environmental improvements and the heritage interest of the site as a military base with Cold War associations to be conserved, compatible with achieving a satisfactory living environment. A comprehensive integrated approach will be expected.”

6.14 Other policies contained within the adopted Local Plan of relevance to this application are summarised below.

6.15 **Policy SLE 1: Employment Development** states that employment development will be focussed on existing employment sites. It further states inter alia that on existing operational or vacant employment sites including rural areas employment development, including intensification, will be permitted subject to compliance with other policies in the Plan and other material considerations. The supporting text at

Paragraph B.38 sets out that the Council will support existing businesses and will seek to ensure their operational activity is not compromised wherever possible.

- 6.16 **Policy ESD 10: Protection and Enhancement of Biodiversity and the Natural Environment** seeks to protect and enhance biodiversity through a range of measures including seeking net gains in biodiversity; encouraging the protection of trees; encouraging the reuse of soils; protecting against significant harm arising from development proposals and the safeguarding of identified habitats and designated sites.
- 6.17 **Policy ESD 15: The Character of the Built and Historic Environment** advises that where development is in the vicinity of any of the District's natural or historical assets, the delivery of a high quality design that complements the asset will be essential. The policy requirements set out in **Policy ESD 15** apply to all types of development.
- 6.18 **Paragraph B.268** highlights the appearance of new development and its relationship with its surrounding built and natural environment as potentially having a significant effect on the character and appearance of an area. The need to secure new development that can positively contribute to the character of its local environment is of key importance and reflects the approach and significant criteria listed under **Policy ESD15**.

Cherwell Local Plan 1996

- 6.19 The following saved policies of the **Cherwell Local Plan**, adopted November 1996, remain extant and relevant to the proposed development following the adoption of the Cherwell Local Plan 2011-2031:
- 6.20 **Policy C23: Retention of features contributing to character or appearance of a Conservation Area** states that there will be a presumption in favour of retaining buildings, walls, trees or other features which make a positive contribution to the character or appearance of a Conservation Area.
- 6.21 **Policy C25: Development affecting the site or setting of a scheduled ancient monument** seeks to protect the site and its setting of a scheduled monument as well as other nationally important archaeological sites and monuments, for which the Council will have regard to the desirability of maintaining its overall historic character including its protection, enhancement and preservation.

6.22 **Policy C28: Layout, design and external appearance of new development**

advises that control will be exercised over all new development, including conversions and extensions, to ensure that the standards of layout, design and external appearance, including the choice of external-finish materials, are sympathetic to the character of the urban or rural context of that development. In sensitive areas such as Conservation Areas, the Area of Outstanding Natural Beauty and areas of high landscape value, development will be required to be of a high standard and the use of traditional local building materials will normally be required.

7. ECONOMIC CONSIDERATIONS

Car Processing at Upper Heyford

- 7.1 The car processing operations at Upper Heyford is operated by Paragon Fleet Solutions Ltd which is now part of the BCA Group.
- 7.2 Paragon first moved to Upper Heyford in 1995. At that time, it had 120 employees and when the previous application was submitted in 2013 they had increased their workforce to approximately 500 employees. At the current time, the number of people employed at the site has increased to approximately 600.
- 7.3 A major factor in the decision by Paragon to move to Upper Heyford was the nature of the buildings available, being spacious without the constraints of internal columns, enabling the movement of cars within the buildings coupled with the associated space to stage vehicles as part of vehicle processing. Whilst the buildings are not “high tech” the operations within them are. The facilities at Upper Heyford are well suited to the current operations.
- 7.4 The location at Upper Heyford is well suited for Paragon, allowing optimum access to their customer base and in the past 12 months Paragon have managed approximately 21,000 demonstrations, 25,000 PDIs and 9,500 vehicle de-fleets through the Upper Heyford facility.
- 7.5 To meet the operational needs of the business, Paragon require capacity at Upper Heyford up until the end of 2021 for 8,000 vehicles.

Customer Base at Upper Heyford

- 7.6 Section 2 of this Statement provides an overview of the BCA Group as a whole including the range of OEMs, leasing/rental companies and dealer groups that form their customer base. At Upper Heyford vehicles are processed for the following customers:
- OEMs – JLR, Volvo, Nissan, Infiniti, BYD, Tesla and Kia;
 - Leasing/Rental – Arval and LIDL; and
 - Dealer Groups – Sytner, Jardine’s, Harewood’s, Citygate, Tollbar and Alan Day.

Workforce at Upper Heyford

7.7 Paragon is the largest current employer at Upper Heyford and, it is believed, the third largest employer in Cherwell District. With an annual wage expenditure of £11.8m, Paragon makes a significant contribution to the local and regional economy. Paragon directly provide approximately 600 jobs, a significant proportion of the total number of jobs currently provided at Heyford Park.

7.8 The breakdown of roles at the Upper Heyford site is as follows:

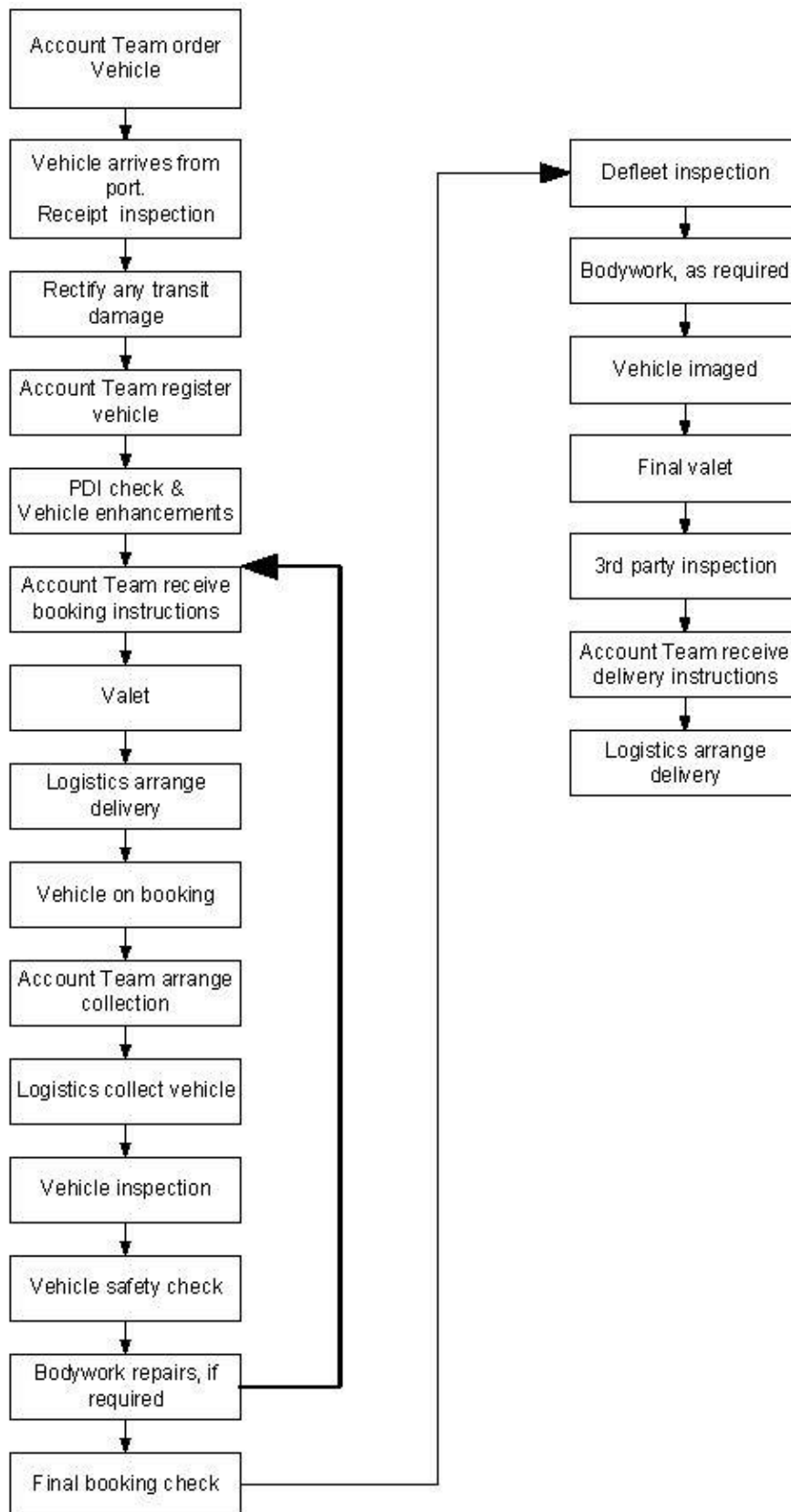
- Logistics – Driver, Admin/management and Agency;
- Inspection – Vehicle inspectors;
- Compound/Gatehouse – Yard Operatives, Yard Admin / Management, Keyroom operatives and Gate house operatives;
- Bodyshop/Smart Repair – Panel repairers, Smart repairers, Wheel fitters, Paint sprayers, Polishers, Maskers, Quality Control operatives and Admin / Management;
- Mechanical Workshops – Workshop Technicians and Admin/Management;
- Administration (depot) – Facilities supervisor, Facilities operative, Operational admin coordinators, Operational Management and GM/Senior Management;
- Valeting – Valeters, Admin / Management and Photo booth operative;
- Account Administration – OEM account managers, OEM account coordinators, OEM account supervisors, Corporate account coordinators, Corporate account supervisors and Floor Manager;
- Management / Finance – Credit controllers, Business analysis, Payroll Controllers /Managers, Management accountants and Treasury;
- Technicians – Master Technicians, Senior Technicians and Workshop Technicians; and
- Other – Security officers, IT (for the BCA Group as a whole), Sales/Account Managers, Canteen and Cleaners.

The Life of a Vehicle at Upper Heyford

7.9 The processes which take place at Upper Heyford are often complex and employment intensive and are perhaps best understood in terms following a vehicle through its life with the facility. What follows is a step by step look at a vehicle's life at Upper Heyford:

- Client account teams consist of a group of employees who are usually individual teams of our employees funded by each manufacturer individually who manage the vehicle;
- The car is ordered by the account teams from the manufacturer in accordance with agreed fleet rotation which is defined as the period which the car will be used by Clients employees or as a demonstrator;
- Car received from manufacturer;
- Account teams register the car and instruct the workshop to prepare the car (Pre delivery inspection);
- Workshop spend between 1 and 4 hours preparing the car dependent upon programme plus carrying out any mechanical or bodywork required. The level of work can range from a standard pre delivery inspection taking in the region of 1.5 hours where all transport identification stickers are removed, plus level checks and valet are completed to full safety checks where recall campaign work, warranty and enhancement work is carried out. The latter can take up to 4 hours where the highest level of mechanical expertise is required;
- Account teams receive instructions for delivery of the car to either an employee or an individual who would be test driving the vehicle as part of a demonstrator programme;
- Valeting takes place which again dependent on the programme consumes between 1 hour and 2 hours labour per unit;
- Logistics team arrange for the delivery of the car to the end user;
- In the case of demonstrator programmes the account team arrange for collection and return to Upper Heyford after the demonstration period;
- Logistics collect the car;
- Upon return the vehicle is inspected and any work required carried out;
- New booking taken and the vehicle goes through the same cycle;
- At the end of the life of the car within the company car and demonstrator programmes it will be refurbished to the manufacturer's sale standard which could entail body or mechanical work plus valeting. To meet the standards required for sale the preparation time is on average 15 days. The car will then be temporarily retained on site prior to sale;
- Account teams will in liaison with the manufacturer arrange for delivery of the car to the purchaser (usually a dealer); and
- Logistics arrange delivery.

7.10 This complex process can also be shown in diagrammatic form, as follows:



Paragon as a Part of the Local Community

- 7.11 Paragon has continued with the hard work carried out by Paragon in developing strong and lasting links with local schools by offering work experience placements, presentations and site visits. In addition, Paragon continues to operate an apprentice programme.
- 7.12 Paragon proactively support a wide range of groups and organizations within the local community and becomes involved in a large number of local events and initiatives.
- 7.13 Many of the Paragon employees live within Cherwell District and Brackley and the workforce makes a major contribution to the local economy.
- 7.14 The same applies to purchases that the business itself makes, as it is Company policy to purchase wherever it is economic to do so from local companies. Indeed, the majority of outsourced site support services, e.g. security, site maintenance cleaning and canteen facilities are local companies, who also recruit employees from the local community. Many local companies have come to rely on business with Paragon over the years, and the Company expenditure with local suppliers in the last 12 months has been approximately £15 million.

Investment by Paragon at Upper Heyford

- 7.15 Paragon have a rolling programme of investment in the facilities at Upper Heyford. As part of the programme the Company has recently invested or committed to:
- £800k on the refurbishment of Building 350 for JLR product;
 - £100k on electric vehicle infrastructure;
 - £50k on security enhancements;
 - £50k per annum on roof repairs;
 - £10k per annum on road repairs; and
 - £5k per annum on grass maintenance.

Options Paragon Have Considered for Reducing the Car Processing Area

On-Site Efficiencies

- 7.16 As a business Paragon are constantly reviewing how its vehicles are processed to optimise the use of space. However, the reality is that whichever way 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 be a maximum number of units that can be stored on site. Thus, the ability to improve current space utilisation through changes to flow processes and parking arrangements is limited.
- 7.17 Consideration has been given to creating additional processing space on site by the use of introducing decking and/or underground options level arrangements. Both options are cost prohibitive and not viable. External decking solutions would also likely create significant planning issues in terms of visual and heritage impacts.

Providing Certain Operations Off-Site

- 7.18 The business has examined alternative sites where various elements of the operation could be carried out. This however would be impractical from both an operational and financial perspective. Paragon's operations at Upper Heyford are an 'integrated process' and it would therefore be unsuitable, unsustainable and economically unviable to separate the vehicles from the various technical processes which take place.

The Complete Relocation of the Business from the Site

- 7.19 The business of car processing has been operating from Upper Heyford for over 20 years and has developed a highly skilled workforce over this time with strong links into the local community. The development of a business of this nature does not happen overnight especially in terms of development the skilled workforce.
- 7.20 By virtue of its location at Upper Heyford and the nearby motorway network the business is ideally positioned to meet the needs of its clients.
- 7.21 Upper Heyford offers, to all intents and purposes, a 'purpose built' facility for Paragon - the quality and type of the hangar buildings that are available suits Paragon's requirements very well providing large open plan and secure buildings with space for internal movement at affordable rental levels. In addition, the site

provides a large area to stage cars between processes and also provides office accommodation for that side of the business.

- 7.22 To relocate the business from its current location would be both exceptionally costly and prohibitive bearing in mind the time required to re-create the current skill sets employed.

8. REASONED JUSTIFICATION

8.1 This section of the Statement addresses the main planning issues that are likely to arise during the consideration of the planning application.

Principle of Development

8.2 The principle of car processing at Upper Heyford has been established by the grant of planning permission by the SoS (appeal ref: APP/C3105/08/208594). Therefore, the principle of accommodating vehicle processing within the Conservation Area is established.

8.3 With regard to the application site in particular, the principle of using the site on a temporary basis in connection with the lawful car processing operations has already been previously established (application ref: 13/01599/F), albeit on a smaller area than currently proposed. That permission is due to expire in May 2019 and its continued use on a further temporary basis is the subject of this current application.

8.4 There will be no change to the part of the application site subject of the existing temporary planning permission and it therefore follows that the proposed continued use does not introduce a new change to the character or appearance of the Conservation Area that has not previously been considered. A similar conclusion can be drawn to the 'extended' part of the application site which will be used for the same purpose as the previous temporary permission. The change is one concerning the area of the use, again for a further temporary period up until 31st December 2021.

8.5 The NPPF at para 82 advises LPAs to make planning decisions that help create conditions in which businesses can invest, expand and adapt. It goes on to say that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

8.6 While at a local level in the adopted Local Plan, Policy Villages 5 relates specifically to RAF Upper Heyford and for the site to provide for, inter alia, employment opportunities. Policy SLE1 concerns employment development and states that employment development will be focussed on existing employment sites and that, inter alia, employment development, including intensification, will be permitted on

existing employment sites subject to compliance with other policies in the Plan and other material considerations.

- 8.7 It is therefore clear that there is support from the Government at a national level to build a strong and competitive economy through business development and CDC have an adopted planning framework that seeks to support existing businesses and will seek to ensure their operational activity is not compromised wherever possible.
- 8.8 The application now made does not seek to introduce any new built or type of engineering operation which has not otherwise already been approved by CDC for other parts of the site.
- 8.9 In Section 7 of this Statement we describe the number of employees (approximately 600 people), the range of roles involved in the car processing operation, the local employment base and annual wage expenditure (£11.8m), and the expenditure with local suppliers (£15m) as well as the important, but indirect benefits to Cherwell arising from running a major business at Upper Heyford.
- 8.10 Paragon therefore remains a major business important to the local economy and also important to the concept of creating a sustainable community at Upper Heyford with both houses and jobs in close proximity creating the opportunity to live and work in Cherwell.
- 8.11 On this basis it is concluded that the car processing operations at Upper Heyford is well established for some 23 years and is a major local employer of importance to the economy of Cherwell District. It follows that the economic and employment considerations are substantive and capable of providing the justification required for planning permission in accordance with planning policy at a national and local level.
- 8.12 Furthermore, the proposed continued use as extended would again be on a temporary basis and the hybrid application currently under consideration by CDC proposes a long-term solution of car processing operations at Upper Heyford and subject to that permission being granted would allow for the phased transition from the land as currently proposed to the new long-term operation post 2021.

Heritage Considerations

- 8.13 With regard to the character and appearance of the Conservation Area it is noted that the eastern boundary of the lawful car processing use was volunteered by the

Applicants at the time of the Inquiry as an arbitrary line drawn to link the storage areas. It is understood that this did not consider, in detail, the ability to process vehicles in practical and detailed terms. Neither the Inspector nor the SoS drew any conclusions concerning the eastern boundary. Unlike the western boundary, no revisions or limitations were canvassed. Nevertheless, it is also to be noted that the Inspector found that the proposed use would be concealed from public views outside the site and very little or none would be seen from the reopened Aves Ditch public footpath (para 19.201).

- 8.14 Consideration has been given to whether the area now proposed would be visible from public views outside the site or from any alignment of the reopened Aves Ditch public footpath which is now reasonably in prospect. The Visual Assessment which accompanies this Statement demonstrates that the proposed use would continue to be concealed from public views outside the site. With regard to the Aves Ditch public footpath this is now understood to be most likely to be reopened on an alignment which is routed south of the bomb stores and around the eastern end of the main runway. The Visual Assessment demonstrates that the proposed use would have no material impact on the appearance of the Conservation Area from any such viewpoint.
- 8.15 The Visual Assessment also evaluates the potential effect on a range of views from within Upper Heyford. Key views are tested from the main runway, reconnected footpath (Portway), taxi ways in the central plateau, Northern Bomb Store and Special Weapons Area, Northern Taxi way at the proposed reconnection of Aves Ditch footpath, Perimeter Road. It is evident from the Assessment that the proposed use can not be seen from the greater majority of the Upper Heyford Conservation Area. It is also evident that views from the only vantage points (from the main runway) are views in which the existing car processing operation can also be seen. Therefore, the extension does not introduce any new element into views or the character of the Conservation Area.
- 8.16 The proposal does not however simply seek to maintain the status quo. The eastern boundary of the proposed use is realigned some 175 metres to the east compared with the former position. Importantly the screening and security details will be designed to follow the form and details accepted by CDC elsewhere on site. The proposed treatment to the boundaries will help mitigate impact and will effectively filter views from outside the car processing area.

8.17 With regard to the character of the Conservation Area we note that the proposed area lies outside the Core Area of National Significance and away from the Scheduled Monuments and Listed Buildings. It is important to note that the SoS approved the lawful use for car processing in the Regionally Significant area and in close proximity to the area of National Significance. In doing so the SoS concluded that the original proposal minimised the visual impact of the parked vehicles by “using the least sensitive part of the site” (para 26). The current proposals are in part located in the Area of Regional Significance accepted by the SoS but the majority of the site lies outside in an area of lesser significance in terms of the character of the Conservation Area.

Transport Considerations

8.18 The proposed temporary use and existing retained processing areas will provide an operational capacity for approximately 8,000 vehicles.

8.19 In the consideration of the previous application for temporary planning permission, no objections were raised by the Highway Authority as a consultee or by CDC in their granting of permission. The use of the land was considered to have no material impact on the level of traffic generated or on the route traffic would take. It is considered that the same conclusion would apply to the further temporary planning permission sought, albeit for a slightly larger site to that previously approved.

8.20 Another material consideration is the Hybrid Application planning application currently being considered by CDC which proposes a reorganisation of the land at Upper Heyford associated with car processing operations and would accommodate a similar level of vehicles. The Transport Assessment (TA) accompanying that application concludes that the transport provisions for the development proposed in the Hybrid Application, which includes the reorganised car processing operations carried out by Paragon, can come forward as planned and make a positive contribution to housing and employment delivery in the Cherwell District and wider Oxfordshire economy.

8.21 Accordingly, the further temporary permission proposed would be acceptable from a highways and transport perspective.

Summary

8.22 For all these reasons it is concluded that the proposals are supported by the economic and employment considerations, and that these outweigh the harm arising to the character and appearance of the Conservation Area. We respectfully recommend that a further temporary planning permission is granted.

9. CONCLUSIONS

- 9.1 Car processing operations is a long established use at Upper Heyford having operated from there since 1995.
- 9.2 The principle of car processing is therefore well established and the use of a large part of the application site itself has already been approved for use in connection with the car processing operations, albeit on a temporary basis until May 2019.
- 9.3 The current application seeks a further temporary planning permission for 3 years until 31st December 2021 for the continued use of the land in connection with the lawful car processing operations within the area previously granted temporary permission and extended slightly eastwards.
- 9.4 The proposed continued use as extended does not introduce a new change to the character or appearance of the Conservation Area that has not previously been considered. The temporary use of the land is required by Paragon to meet their ongoing operational requirements and would be a temporary measure as the company transitions, subject to planning, to the proposed long-term solution to be delivered for car processing operations at Upper Heyford as proposed in the hybrid application currently under consideration by CDC.
- 9.5 The NPPF highlights the importance of making planning decisions that help create conditions in which businesses can invest, expand and adapt with significant weight placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 9.6 Economic considerations are material to the determination of this planning application and Paragon currently have at their Upper Heyford site:
- approximately 600 employees in the car processing operations across a range of roles;
 - an employment base which resides predominantly within the Cherwell District;
 - an average wage expenditure of approximately £11.8m per annum;
 - expenditure with local suppliers of approximately £15m per annum;

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- provision of indirect benefits to Cherwell arising from running a major business at Upper Heyford; and
 - a rolling programme of investment into the buildings and site at Upper Heyford.
- 9.7 CDC also have an adopted Development Plan at a local level which supports employment opportunities at RAF Upper Heyford and focussing employment development, including intensification, on existing employment sites subject to compliance with other policies in the Plan and other material considerations.
- 9.8 The use is on the least sensitive part of the site in terms of the character of the Conservation Area. When compared with the current planning permission for car processing entirely within the Regionally Significant Area it can be seen that the new area lies partly in the Regionally Significant Area but the majority is within a Locally Significant Area.
- 9.9 No publicly accessible views from outside the site and Conservation Area are affected, nor will there be a material impact on views or character associated with the proposed realignment of the Aves Ditch public right of way.
- 9.10 Circumstances at the site have therefore not materially changed since the previous planning application for temporary permission was considered acceptable and granted in May 2014 and thereafter been operated in an acceptable manner.
- 9.11 It is therefore considered that the application by Paragon is, on balance, considered acceptable and in accordance with planning policy at both a national and a local level.