



The countryside charity
Oxfordshire

Campaigning to protect our rural county

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Department for Levelling Up, Housing & Communities
2 Marsham Street
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Date: 17th January 2022

**Reference: Cherwell District Council Planning Application 212/01224/OUT
Bicester Aerodrome**

Dear Mr Gove,

With reference to the Cherwell District Council (CDC) Planning Application 21/01224/OUT Land at former RAF Bicester, that was on the agenda for the Planning Committee on the 13th January, there were many aspects that the officers, in both the written reports and the verbal presentation, had skewed to the advantage of the applicant and to the severe detriment of the registered Local Wildlife Site (LWS) and the historic aerodrome.

Executive summary

- CPRE are extremely concerned that the LWS surrounding the flying field is being destroyed piecemeal by consecutive applications
- The position of objection of Historic England (HE) has arguably not been adequately conveyed to the committee
- There has been no formal or structured assessment of the cumulative impacts on heritage assets,
- The full impact of the proposed damage to the flying field by the construction of racetracks has not been fully assessed in heritage terms
- CPRE have encouraged HE to take all possible action to protect this historic asset



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Major comments

CPRE are extremely concerned that the LWS, that is in the approved CDC Local Plan and which surrounds the flying field, is being destroyed piecemeal by consecutive planning applications. Very rare calcareous grassland will be destroyed by a series of large sheds to the southeast. There is a further approved planning application for the construction of a very large hotel, alongside the historic hangars that are scheduled by HE, again on part of the LWS. If the most recent application is constructed, another large area of the LWS to the northwest will also be lost.

There has been no formal or structured assessment of the cumulative impacts on heritage assets on the current proposals, both material and wildlife, in combination with previous ones. This matter was dismissed, but the approach that the applicant is taking has been found to be unlawful elsewhere. At the 13th January Planning Committee meeting the officer questioned 'what else would an Environmental Impact Assessment (EIA) would bring' without understanding that it would require a holistic not a piecemeal assessment.

The officers quoted a part of the EH report and National Planning Policy Framework (NPPF) para 202 but omitted the end of the sentence which stated that 'The accumulative harm of the multiple developments both past and future within the RAF Bicester site should not be disregarded'.

It is interesting to note that there are two major parts to the application. One is the "Experience Quarter" buildings to the northwest and the second is the intention to destroy the grass "landing ground" with a series of racetracks, that will severely challenge the requirement for the area to be open. It was never explained how the operation of the racetracks could be accomplished without serious damage to the flying grass areas by support vehicles, marshals, emergency vehicles, etc.

The 'landing ground', to give the area its historic name and reasoning, is at present an area of grass that has not been treated with any chemicals since the 1930's and is greener than any of the industrially farmed fields in the district. To construct areas of concrete racetracks on this would be sacrilege.

In order to deliver habitat compensation for the most recent application, the permission secures excavations of 'bunds and scrapes' in the flying field, which can only harm the heritage and environmental asset of the flying field. The impact of these has not been assessed in heritage, or indeed any other terms.

CPRE contend that officer's report to the CDC Planning Committee Planning has misconstrued CDC Local Plan Bicester Policy 8 for RAF Bicester. That is on page 84, paragraph 9.48 of their report, the officer's stated that the plan 'allocates the whole flying field ... for significant development whilst maintaining and enhancing the Conservation Area's character and appearance'. This runs counter to CPRE's interpretation of Policy 8. Para C92 on page 161 of the CDC Local Plan states that 'Bicester 8 seeks to secure appropriate uses for a long-lasting '**conservation-led**'



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approach to the technical site and flying field. It aims to establish uses that will be complementary to, and help enhance, the **character and appearance of the conservation area and the nationally important heritage value of the site**. It seeks to encourage a mix of uses that will **best preserve the sensitive historic fabric and layout of the buildings and the openness of the grass airfield**'.

The planning committee members were misled by the officers at page 84 / 85, paragraph 9.49 in the Officer's report where they state that 'When considering 'harm' to an historic asset, the NPPF provides different approaches for considering 'substantial harm' and 'less than substantial harm'".

On this matter, both HE and the Council's Conservation Officer agreed that the proposals constituted 'less than substantial harm' and therefore should be considered in accordance with the tests set out in paragraph 202 of the NPPF.

They have both concluded that the 'heritage' benefits of the scheme did not in themselves outweigh the harm, which they both considered to be significant (and HE towards the higher end of the scale). However, as conservation specialists it is not within their remit to consider other public benefits that the Local Planning Authority may consider to be a benefit. This statement, along with the applicant's sales campaign, suggested to the members of the planning committee that the applicant's estimates of potential public benefits outweighed the opinion of the Heritage organisation, set up to protect historic assets, such as those at Bicester Aerodrome, for future generations. Basically, the officers suggested that they were better judges of the importance, or otherwise, of an historic area than HE. The position of objection of HE has arguably not been adequately conveyed to the committee.

The officer's report, and the discussion at committee, did not appear to adequately consider the balance between public benefit and heritage (and other) harms. The public benefit was called into question by local residents voicing their clear concerns with more than 80 representations raised and lengthy discussions about noise control and regulation at the planning meeting. Which 'public' was it that CDC considered in receipt of overriding benefits? The officers presented the economic developments as more important than the concerns of local residents.

The 'public', the applicant referred to, was of course those who operate and own historic cars and the tourism that might accrue. Any gain that the public might benefit from on a day-to-day basis, as opposed to the special events was not defined.

The report by the applicant's aviation expert was written from the standpoint that the reduction of the flying field from a 360 degree landing and takeoff to just two fixed runways was allowable from an historic aspect. They go further by suggesting that the encroaching developments now prevented a return to the historic 360 degree flying field, which was incorrect as the reduction in operating facilities had only occurred very recently; the flying field was, and still is capable of 360 degree operations. Basically, the consultants made the assumption that they only had to consider the situation as it was now with two runways rather than the historic



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reasoning. They asked for a safeguarding exercise and for it to be lodged with the Local Planning Authority (LPA) but such a safeguarding document had already been lodged with the LPA for the 360-degree historic operation. It is worth pointing out that the 360-degree operation would become impossible with the implementation of the racetracks across the otherwise pristine landing ground. The aviation consultants have not assessed the impact of continued flying operations with the proposed racetracks across the flying area.

The 'watch tower' allowed flying operations prior to the use of radio and provides views across the open landing ground; these views will be corrupted by the introduction of modern concrete racetracks in both the foreground, and in the areas beyond, in direct contradiction to the very reasons for the conservation definition that CDC established. CDC also produced a booklet defining the importance of the designation in 2000.

The CDC Local Plan identifies the aerodrome under Policy Bicester 8 Former RAF Bicester which states that developments '**must maintain and enhance the character and appearance of the conservation area**, protect listed, scheduled and the important buildings, **their setting**, and protect the sensitive historic fabric of the buildings and **preserve the openness of the airfield**'. Policy Bicester 8 states that developments should be considered against CDC Local Plan Policy ESD 15 The Character of the Built and Historic Environment.

Policy ESD 15 states that new development proposals should 'be designed to **improve the quality and appearance of an area and the way it functions**'. They should also '**conserve, sustain and enhance designated and non designated 'heritage assets'**(as defined in the NPPF) including buildings, features, archaeology, **conservation areas and their settings**, and ensure new **development is sensitively sited and integrated** in accordance with advice in the NPPF and National Planning Policy Guidance (NPPG).

CPRE contends that the proposed racetracks will do the exact opposite of what has been highlighted in bold above and the application, and its failure to comply with the Council's own Local Plan, needs to be raised.

The applicant has had a number of film companies that had used the airfield, which was excellent. They used the openness of the flying field and the background of the historic hangars and watchtower. They used take-off and landing directions to suit both the wind and the required filming. These are welcome uses that bring economic benefits to Bicester in a way compatible with the heritage assets and with Policy Bicester 8; but none of these will be possible if this application is allowed to proceed.

The report from HE was not fully presented to the members of the planning committee as the following was omitted:- 'Given the importance of the flying field to the site and the scale of the change proposed we consider that this proposal would cause a high level of harm to the RAF Bicester conservation area and the listed



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buildings directly facing the flying field' and 'In our view these benefits are disappointingly nebulous, and do not nearly outweigh the harm that the proposals would cause'.

It is extremely important for this application to be called in by the Secretary of State before significant damage is done to the historic site and the LWS registration that it would no longer be able to be registered as such, with the loss to the country of what is today an important asset.

Yours sincerely,

pp Pam Roberts
Vice Chair, CPRE Cherwell District,

cc Sir David Gilmour,
Chair of CPRE Cherwell

cc Helen Marshall,
Director, CPRE Oxfordshire



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