

John Howell MP,
PO Box 84,
Watlington
Oxfordshire
OX49 5XD

21st October 2020

Dear John,

Chalgrove Airfield Development

We are writing to you today as a collective of 23 parishes that will all be materially affected by the Chalgrove Airfield Development. All of these parishes are currently, and always have been, opposed to this strategic allocation for good planning reasons.

We are not attempting to ask you to support our case based on the detail of planning processes to date, rather we are appealing to you at a higher strategic level of whether the current regulatory environment is producing good planning solutions. We do not think that it is, for all the reasons set out below, and we feel that the example of Chalgrove is a good case study to use in the context of the current White Paper regarding the overhaul of planning regulation.

We note that you recently intervened directly to request that Robert Jenrick ensured that a site that was not in the latest draft of the SODC Local Plan (Harrington) was not considered (letter of 8th June 2020). This you argued was for the following 11 reasons every single one of which also applies to the Chalgrove new town development "CNT":

- i. Inherently flawed as a strategic site – **see notes re CNT below**
- ii. Huge investment would be necessary to allow access to & from both carriageways of the motorway – **see notes re CNT below**
- iii. It is in the wrong location to form part of the Arc - **the same applies to CNT**
- iv. Disastrous to build a large new town in this Oxfordshire heartland - **the same applies to CNT**
- v. Sits in a classic Oxfordshire landscape of rolling fields & ancient hedgerows running up to the Chiltern escarpment – **as CNT and although Homes England like to suggest that the airfield is a brownfield site, that is simply not true in reality for the vast majority of the area of the site.**
- vi. It is an area interspersed with small market towns and villages - **the same applies to CNT**
- vii. A town this scale would have an incalculable impact in this beautiful valley - **the same applies to CNT**
- viii. Would be utterly out of scale with any other settlement in this part of the country - **the same applies to CNT**
- ix. Lies neither near existing railway routes nor near the route for the new East West Rail - **the same applies to CNT**
- x. A new town accessible only by road is simply unacceptable from an environmental perspective - **the same applies to CNT**
- xi. A direct rail connection is surely a necessity - **the same applies to CNT**

Regarding the first two points above, we comment as follows:

- i) **CNT is inherently flawed as a strategic site**
 - a. It is not located near the demand for housing, nor near the major centres of employment
 - b. The plans demonstrate creation of only circa 1,300¹ local jobs, whereas, based on the ONS data for employment per household in the UK of 1.19², the 3,000 households will need 3,570 jobs, and **so 2,270 individuals will have to travel outside CNT to work.** Some of the local jobs will inevitably be taken by people not living in the new town, so there will be also be commuting journeys into the CNT workplaces.
 - c. It will be a car-based development, contrary to the Zero Carbon 2050 target. There is no rail connection, it is patently unrealistic to expect people to cycle the 10-12 miles to the main Oxford employment zones, and the commitment to 4 buses per hour implies only circa 600 people per day could feasibly travel by bus (based on 50 per bus and a generous assumption of a 3 hour spread of start times 0600-0900). The bus is only proposed to run during commuting hours, which means that key workers on shift patterns will be unable to use it. **The balance of 1,670 will therefore, in their vast majority, travel by car.**
 - d. With a 40% target for affordable housing, and the lack of transport infrastructure, **CNT is likely to become an area of deprivation** as those on low incomes will not be able to travel to the main employment locations and there will be nowhere near sufficient employment within CNT.

- e. There are material **safety concerns** on this site. Locating a major housing development adjacent to an **operating airfield which also uses explosives is a remarkable unsafe concept**. Martin Baker who currently operate on the site, have consistently pointed out the incompatibility of their operations with a housing development. Residents and schoolchildren will be within a few hundred metres of a newly constructed runway with fast military jets and frequent explosions. Martin Baker's submission for the Planning Application lays out the argument in detail³
 - f. There are also material environmental noise implications. Homes England documents state: "Recommendations for glazing performances have been provided as to achieve suitable internal noise conditions. Ventilation will be provided for properties affected by road traffic or aircraft noise, so rooms can be ventilated without breaking the acoustic seal of the building. During periods when windows of residential units are opened for purge ventilation, internal noise levels are expected to exceed the internal guidance levels, however, this would be at the discretion of the room occupant." Proposing that residents do not open their windows when they live in a rural area and if they do, they will be subjected to noise that exceeds internal guidance levels is, I am sure you will agree, unacceptable. The SODC Environmental Protection Team has issued **an opinion of objection⁴ on these grounds, inter alia**.
- ii) **Huge investment would be necessary to allow access to and from the motorway**
- g. In the case of Chalgrove there is no proposed motorway connection at all, **nor is there even an A-road route out of the development in any direction**.
 - h. The population of Chalgrove and CNT will be 9,800, made up of 2,700 currently in Chalgrove and c.7,100 in CNT (based on the ONS average UK household size of 2.37). There are 31 towns in the UK of similar population (9,500-10,000). **29 of these have immediately adjacent A road connections⁵**. St Ives and Cranleigh are the only two that would be similar to CNT without A road connections BUT neither were built as a new town.
 - i. The proposed by-passes are not a solution to the traffic increases that will be generated by CNT. It remains the fact that the routes to the M40 will remain predominantly on B-roads that are not suited to the level of traffic that will be attracted to them by CNT and the by-passes themselves.

We believe that the site has been included in the draft local plan only as a result of a series of misguided decisions that have been taken by SODC, OCC and the Planning Inspectorate.

SODC

There has been a much higher level of response and proportion of objection to the CNT proposal than to any other strategic site at many stages of the consultation process, and yet the site remained in the draft plan. For the March 2017 consultation there were 602 responses, 84% of which were objections higher in both aspects than any other strategic allocation⁶. In the October 2017 consultation there were 384 responses, 94% of which were objections⁷, and again these were higher in both aspects than any other strategic allocation. The recent planning application has received 650 comments from a wide variety of local villages as well as from Chalgrove. It will be interesting to learn how few of these are in support.

OCC

The highways implications of CNT have not been fully recognised. How can it be a sensible planning decision to agree to a development of this scale with no A-road connections. Essentially what we see in the Homes England plans are a set of expensive mitigation actions relating to by-passes, that serve only to ameliorate the short-term issues, rather than what we think central Government departments should be doing, i.e. to establish sensible long term solutions to economic and social issues in the UK. OCC have seemed to be unable to consider the issue on the necessary longer-term strategic basis. In addition, the routes through Little Milton and Watlington to Chalgrove are fundamentally unsuited to HGV traffic, though they are identified as construction traffic routes. Furthermore, the existing Chalgrove bypass will be removed, forcing the through-traffic on an already busy road to pass through housing estates and the new town centre's 20mph zone.

Planning Inspectorate

The Financial Viability Assessment Report prepared by Aspinall Verdi (version 9 dated 3rd July 2020) confirmed that the excess value is limited £17.9m. This is just 1.8% on a gross development value of CNT of £990m.⁸

There are a number of fundamentally erroneous assumptions lying behind this small excess figure including:

- The costs do not include the legal costs of the CPO on Martin Baker and the compensation that would be paid. Were this to amount to more than £18m the site would be unviable based on this aspect alone.
- There are a large number of elements in the development Infrastructure Schedule that are labelled as TBC⁹ and are not included in the calculations. Were these to amount to £18m or more in aggregate, the site would be unviable. These include:
 - Strategic water supply upgrades
 - Wastewater treatment upgrades
 - Sewerage system upgrades
 - Improvements to the electricity transmission network connection
 - Improvements to the gas transmission network connection
 - Chalgrove Flood Risk Management Scheme
 - Mitigation of the impact of M40 access
 - Additional improvements to the highway infrastructure -e.g. Cuxham, Watlington and Benson bypasses
 - Additional improvements to upgrading the sustainable transport
- It does not appear to be the case that the purchase price (£5.5m)¹⁰ of the 467 acres to the north of Chalgrove has been included in the viability assessment, though the availability of that land has been used by Home England in support of their case that the site should remain in the Local Plan.
- The contingency applied across all the costs for the purposes of calculation is only 3%. Developers would more typically use a minimum figure of 5% - requiring an incremental £8m to be allocated.
- One of the most dramatic inconsistencies relates to the designation of the airfield site which goes to the heart of whether this site is viable. The Aspinall Verdi site financial viability report describes Chalgrove as 'greenfield' along with the other 5 strategic sites with a Benchmark Land Value of £350,000 an acre. However, a press release from SODC dated 5 September 2017 states that Chalgrove has 'partially brownfield status'. Homes England also designate it as Brownfield as confirmed by Mr Glendinning in an Oxford Mail article dated 8 March 2019 and by Mr Kinsella in his tweet of 24 June 2020. You appear also to be of this view in recent communications to Chalgrove Shield. For consistency between the planning application and the financial viability report, the site should be described as Brownfield and it would then attract a BLV of £840,000 an acre (BLV assumptions page 62.) As the site is 165 acres this represents a differential of £ 81 million, this alone again making the site unviable.

Given the above major uncertainties, we believe that the CNT proposal is in fact not viable. In this context, **why did the Inspector explicitly rule out any discussion of viability during the EIP?**

Conclusions

The development of a new town with a requirement for at least 3,570 jobs, when only circa 1,300 are likely to be locally available will lead, in practice to CNT being:

- a) A car-based development, operating directly in contradiction to the UK Government Zero Carbon 2050 targets and the SODC target to be carbon neutral by 2030.
- b) A new town that will suffer economic hardship, based on the inappropriate location of the affordable housing, so far from the likely major employment areas.
- c) A UK Government sponsored development that will be a profligate waste of UK tax-payers money given the very likely net negative excess value.

If the Chalgrove Airfield development goes ahead, we believe that you will find that the development will be political dynamite for the Conservative party in the heart of rural southern Oxfordshire, exactly as you argued in the case of Harrington for the reasons mentioned and evidenced immediately above. Please review that evidence as per our references below before you respond.

Action Requested

We are therefore as a collective of these parishes, with a population of over 18,500 asking you to intervene directly with the Secretary of State for Housing to **request** that the final inspectors report recommends the removal of the strategic allocation of the Chalgrove Airfield Development from the SODC Local Plan. This is not because we lack a vision for the future for this area, it is simply because we firmly believe that this is not a sensible location for a new town on good planning grounds as set out above.

We invite you to meet with a small group of us, in an appropriately social distanced manner of course, to discuss our concerns in more detail.

Yours Sincerely,

Ian Goldsmith, Cuxham with Easington Parish
Thomas Birch-Reynardson, Adwell Parish
Chris Bidgood, Britwell Salome Parish
Bill Pattison, Benson & Warborough Parishes
Ian Glynn, Berrick Salome Parish
Leigh Greenham, Brightwell Baldwin Parish
Ann Pritchard, Chalgrove Parish
Gemma Benoliel, Ewelme Parish
Amanda Sheppard, Great Haseley Parish
Steve Harrod, Great Milton Parish
Caroline Hjorth, Lewknor Parish
Alaric Smith, Little Milton Parish
James Nettleton, Newington Parish
Tom Dunn, Pishill Parish
Colin Ludlow, Pyrton Parish
Robert Parker, Shirburn Parish
Stephen Dawson, Stadhampton Parish
Richard Woodeson, Stoke Talmage Parish
Liz Longley, Swyncombe Parish
Paul Carr, Tetsworth Parish
Matthew Reid, Watlington Parish
Rodney Mann, Wheatfield Parish
Anna Badcock, Councillor
Caroline Newton, Councillor

Sources:

1. Average expectation on Homes England Analysis p.10 of Economic Strategy available here:
https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1298531593&CODE=C6246AF9606508D8A71B2EF7F9E6097D
2. Derived as 33.0m in employment divided by 27.8m households (Feb 2020)
<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/datasets/summaryoflabourmarketstatistics>
<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/bulletins/familiesandhouseholds/2019>
3. See: https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1298530941&CODE=95B71FED8866359AC057284D3B28369B
4. See https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1298531540&CODE=C6246AF9606508D8F0E6F357AF008F74
5. Derived from analysis of town populations and review of google maps for each town. <http://lovelytown.co.uk/populations/townstable1.asp>
6. <http://www.southoxon.gov.uk/sites/default/files/Consultation%20summary%20report%20-%20LPP2.pdf>
7. Data available in SODC document available here: [http://www.southoxon.gov.uk/sites/default/files/2019-01-08%20Consultation%20Report%20for%20Reg%2019%20First%20\(Final\).pdf](http://www.southoxon.gov.uk/sites/default/files/2019-01-08%20Consultation%20Report%20for%20Reg%2019%20First%20(Final).pdf)
8. Viability report updated here: https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283204543&CODE=B79D8153BC48355D5CAA0511E5F65776
9. SODC IDP April 2020 update available here:
https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1283204509&CODE=B79D8153BC48355D1D07139CFB2E0FB6

10. https://www.whatdotheyknow.com/request/605047/response/1451879/attach/5/191017%2023%20RFI2792%20Response.pdf?cookie_passthrough=1