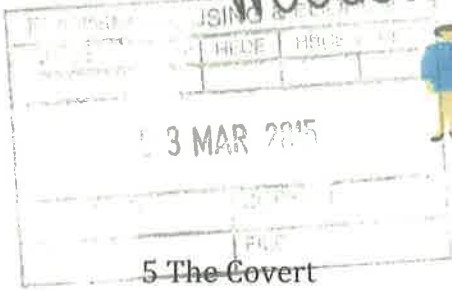


Woodstock Action Group (WAG)



5 The Covert
Woodstock, Oxford
OX20 1UU
February 22, 2015

Mr. Bob Duxbury
Principal Planning Officer
Cherwell District Council
Bodicote, Banbury OX15 4AA

RE: Planning Application 14/02004/HYBRID-Pye-Blenheim, Land South of Perdiswell Farm, Shipton Road, Woodstock East, Shipton on Cherwell

Part II Continuation of Part I

Evidence of accidents, deaths at Oxford London Airport, Continued:

1972, November 9th: A Brantly B-28, G-ATJY helicopter was involved in an accident at the Kidlington Airport." No fatalities.

1992, 12 July: A Piper PA-28-161 Cadet, G-Bpjt at Oxford Airport was involved in a crash. No fatalities.

1994: Oxford Mail, "An inquiry has begun after two aircraft carrying holidaymakers abroad were involved in a near miss above Oxford."

2007, 19 December: A PA34Piper Seneca based at Oxford Airport, crashed in the woods at Wytham, about 4 miles from the runway. The pilot was not hurt.

2008, 9 September: A PA34 company aircraft had to make a wheels up landing. Fortunately, no one was injured.

6. London Oxford Airport Representation to Cherwell District Council

On 12 January 2015, the London Oxford Airport, Mike Sparrow, Airport Manager, made the following representation in part; **OBJECTION** pending safeguarding study. "...there currently is not enough detailed information to undertake a study on the effects of airport navigation aids and radar equipment. No development shall take place until the technical safeguarding study is complete and subject to no adverse impact on airport navigation aids."

Another factor which would impact upon the amenity and tranquility of at least 3,000 or more residents living close to the airport would be air shows such as the "Fly to the Past Airshow" in 2013.

With all this in mind, we ask, ***Are the Pye-Blenheim developers and the Planning Authorities involved willing to be held responsible for any future deaths or injuries incurred by residents or nearby residents if this irresponsible planning application is granted?***

7. Environmental Concerns of Living by Airports:

Aviation Pollution: Aviation pollution is a well-known fact. Research in the United States at a small airport near the town of SeaPac, Illinois has linked aircraft emissions of toxic air pollutants like nitrogen oxides and other volatile organic compounds like CO₂ to an above average rise in rates of cancer near the airport. These pollutants are highly suspected to cause birth defects, respiratory conditions, liver damage and heart disease. Aircraft jet emissions are released at low levels as a sticky spray that settles and is absorbed by ones bloodstreams. It is even ingested and found in drinking water.

8. Plane Truth, a report by **Transport 2000**, says that people and the environment are facing serious threats from climate change gases from the rapidly growing aviation industry.

A 2013 study in Sweden, "**Air Pollution and Children's Health**" by the Swedish Environmental Protection Agency found a small increased risk of cardiac arrest associated with higher ozone levels and recommended that people at high risk for asthma or heart disease should avoid traffic and other sources of air pollution.

9. Aviation Noise. The Plane Truth reported that, "World Health Organization noise limits are regularly exceeded and one in eight people in the UK is affected by noise pollution from aircraft."

10. Noise- Schools and Children: Noise can affect class communication between teacher and students necessary for learning. Research has shown a "decline in reading when outdoor noise levels equal or exceed 65 dBA"

Another study by FICAN * found a significant association between noise reduction and improvement in average test scores for high school students."

"Studies suggest that children seem to be more vulnerable than adults to noise induced hearing impairment. In the young, hearing loss affects communication, cognition, behavior, social-emotional development, academic outcomes and later vocational opportunities. These effects have been well documented in a number of large-scale investigations. Recent research on noise from aircraft and roadways has found that continuous noise in excess of 30 decibels disturbs sleep. The number of intermittent noises during the night increases the probability of being awakened. The elderly, those with sleep disorders and persons with physical or mental disorders are particularly sensitive to night noises. It has been shown that children who reside in noisy environments have elevated blood pressures and of elevated stress-induced hormones.

("Noise Pollution: A Modern Plague," Southern Medical Journal, 2007)

We bring the above facts to your attention because of the planned new Primary School and Care Home for the elderly on what will prove to be on a disturbing, distracting and annoyingly noisy residential site ... if approved.

* *The Relationship Between Aircraft Noise Reduction and Changes in Standardized Test Scores" Federal Interagency Committee on Aviation Noise, July 2007*



**OXFORD
AIRPORT**

Part of proposed development

Bladon Roundabout

runways & flightpaths

11. Oxford London Airport Concerns Over Development: *

1. Plans for tree planting could attract large flocks of birds and rookeries endangering jet and other aircraft.
2. Floodlighting of football pitches and site street lighting patterns could be confused with aeronautical lighting, e.g., landing strips during night flying.
3. Reflective solar panels on roofs could cause "glare" hazards to pilots.
4. Excavations, skips, waste, etc. will attract flocks of birds near airport.
5. Security of the airport will be compromised by increased use of footpaths within the airport boundary and persons gaining access to the airport and runways. Increased security measures may be required because of the risks involved.
6. Noise pollution caused by flight or ground activities at the airport.
7. The development could cause adverse effects upon airport navigation aids and radar.

**Letter dated 13 November 2014 from Mr. Mike Sparrow, Airport Manager to Roger File, Estate Office, Blenheim Palace, Woodstock.*

On 12 January 2015, the airport filed an **OBJECTION** with CDC on the grounds that a Technical Safeguarding Study to ascertain the effects of the proposed development on airport navigation aids and radar equipment was missing. **"No development shall take place"** until this study has shown to have no effects upon airport navigation aids.

12. Traffic and Highway Safety Concerns:

If one estimates, with a considerable degree of foresight, that a development of one thousand five hundred houses (1,500) will result in a minimum of around three thousand (3,000) and more vehicles traversing our main highways, the A44, A4095, A4260, Upper Campsfield Road, the junctions off the A44 through Woodstock (*ex. at Hensington Road*) and on our trunk and minor roads through Long Hanborough, Bladon, Bunker's Hill, Enslow and Kirtlington, it will be the death knell for an already choking, unsustainable local transport system. Commuters are not going to like it nor are the bus companies, delivery, emergency, rubbish and postal vehicles.

The Oxfordshire County Council has stated, ***"The potential traffic impact that the proposed development may have upon the A44 is a concern due to its strategic nature."*** And that's putting it mildly.

The OCC has also stated (9 September 2014) that, "No vehicle access will be supported from the Shipton Road to serve this site ... " (the proposed development.)

The applicant's Traffic Assessment's planned traffic survey was taken in late July 2014 just before local schools broke for the summer recess thus giving a misleading reading of real traffic flow figures on Shipton Road at peak times.

The applicants themselves (EIA Scope Summary 14.1) admit to a ***"Potential for increased multi-modal trip generation during both construction and upon operation."***

13. KEEP US SAFE! say Woodstock Primary School – The School Travel and Road Safety (STARS) Committee met recently and is attempting to prevent cars from parking near the school grounds. “Children need to cross the road safely but the many cars parked nearby are creating a dangerous situation for them.”

A plea was made to encourage parents to park near the library and walk to school with teachers and friends.

Summary: The proposed development will certainly lead to significantly more traffic congestion, more road rage, more CO emissions, and reduced air quality in the area and on Shipton Road specifically. Increased traffic correlates with increased accidents. Drivers and pedestrians will be exposed to higher risks of injuries or deaths.

A planned entrance/exit to the development on the A44 near the busy **Bladon Roundabout** and an irresponsible “hamburger” tranche for cyclists through it, will pose serious dangers for cyclists and will clog the free flow of traffic in all directions. To emphasize this point, I refer you to the below newsprint:

Coach in crash on A44

W OXON: A coach and a car were involved in a collision on the A44 Oxford Road at Bladon yesterday.

Thames Valley Police were called to the scene at 7.44am after reports of the crash at the A4095 Upper Campsfield Road, at the Bladon roundabout.

But spokeswoman Lucy Billen said the vehicles had gone when officers arrived.

There were reports motorists faced disruption in both directions of the A44 at the time of the crash.

South Central Ambulance Service spokeswoman Michelle Archer said they had not been called.

Another news article in the Oxford Mail of December 31, 2014, “*Estate will need protection from sounds of road*” Vale of White Horse DC’s Environmental Protection Team has urged that an “acoustic” fence be built around a planned development of 73 house off Field Close in the village near Abingdon. “**The site is adversely affected by road noise on the A420.**”

We ask, is the A44 all along the proposed development in question noiseless?

14. My Alert-WODC has just informed me of plans (15/00384/Ful and 15/00385/LBC) for the demolition of an agricultural building to erect a development and the formation of an additional car park at **The Cowyards** . This, if approved, will add even more traffic entering and exiting that site on the already choked A44. This is disquietly near the planned entrance/exit to the Pye-Blenheim proposal for 1,500 houses, etc. on the A44.

15. Biodiversity, The Wildlife & Countryside Act 1981, Part I, Wild Birds:

The Wildlife & Countryside Act 1981 is the most important legislation which protects animals, plants and certain habitats in the UK. Basic protection is afforded all wild birds resident or visiting from EU states. These wild birds, their nests and eggs are protected by law from harm,

The Countryside and Rights of Way Act, Part III bolsters the enforcement of the species protection of the above Act. Consequently, every Government Minister and Department and, I must say, every developer and planning authority, *“must have regard to the purpose of conserving and enhancing biodiversity in accordance with 1992 Rio Convention of Biological Diversity.”*

The proposed development would appear to have little regard for such.

Perdiswell Farm’s website lists the following breeding wild birds; Skylarks, Corn Buntings, Yellowhammers, Linnets, Lapwings and Grey Partridges.

In addition, a new wildlife pond and a number of owl boxes have helped to increase the bird population. The farm has a well-established range of habitats for all forms of wildlife including 10 acres of woodland and 4 miles of new and replacement hedgerows. Any ‘important’ i. e., over 20m long and at least 30 years old hedgerows on the farm and containing species of wild birds animals or plants listed in the Wildlife and Country Act or Joint nature Conservation Committee publications needs special permission from the local authority to remove. According to the The Hedgerow Regulations 1997, it is against the law to remove countryside hedgerows without proper permission and subject to an unlimited fine. There are also Brown Hares in nearly every field and Curlews thriving on the ***Oxford London Airfield site.***

The applicant’s planning application delivered on Monday 1 December 2014, lists under “Constraint Type” that the site adjoins the District Wildlife Site, Sansom’s Lane Green Lane 41NO3 to include such species, and other fauna as Slow Worms, House Sparrows, Barn Swallows, and Pole Cats on site and Eurasian Badgers and Barn Owls within 150 metres.

It is obvious as the nose on one’s face that this development will have a deleterious effect upon a site supporting a variety of species of wildlife and should not be allowed.

16. Sites of Special Scientific Interest: Blenheim Park and Others

Blenheim Park grounds lie within 2 kilometres of the proposed development site as does Shipton on Cherwell and Whitehill Farm Quarries. The Park is a nationally recognized Site of Special Scientific Interest (SSSI). As an SSSI, Part III of **the Countryside and Rights of Way Act** protects it from those that would intentionally destroy or damage the interests of a SSSI or **disturbs SSSI fauna.** *This development will do just that.*

16. Statutory Bodies - Representations:

1. Natural England – OBJECTS as the development site lies within 6km of an internationally and nationally designated Natura 2000 site, Blenheim Palace, it *“... therefore has the potential to affect the features of Blenheim Park, SSSI.*

Ex. By airborne pollutants from significant increases in vehicular usage within **200 metres from the Palace including nitrogen oxides, which can destroy nearby** vegetation.

(Letters to Cherwell District and West Oxfordshire’s District Councils, 16 Feb. 2015)

2. International Council on Monument Sites (ICOMOS) - UK

ICOMOS-UK is the National Committee of ICOMOS whose role it is as special advisor to **UNESCO** on cultural World Heritage Sites such as Blenheim Palace.

“... the replacement of open farmland with the major development proposed would have a negative impact on the tranquility of the closest part of the WHS , from increased traffic flows and from lighting , *particularly for floodlit sports pitches*. This would be greater in the winter when the leaves are off the trees and *in the evenings*.”

“... it is difficult to argue that the replacement of open fields by a large area of mixed development would enhance the setting of the WHS or its approach from the south. The whole of the World Heritage Site and its setting needs to be seen as a sustainable unit that has the potential to deliver considerable benefits if its assets are carefully nurtured and developed. *WAG does not consider that this proposed development in any way respects these approaches*.”

3. English Heritage

English Heritage is to prepare its response to the development to CDC by February 27, 2015. However, in letters by Chris Welsh, Inspector of Ancient Monuments, (17 September 2014 and 29 January 2015) states “*In our view, the proposed development, in significantly reducing the appreciation of that rural setting of the Villa, (Roman Villa-Blenheim Villa) is likely to cause a level of harm which might amount to substantial harm*.” He also made the comment that, “*The current setting of the Blenheim Villa is largely agricultural and clearly any development adjacent to the monument is likely to reduce the appreciation of its rural setting and therefore its historic illustrative value. This has the potential to cause harm which may well be substantial*.”

4. National Planning Policy Framework, Para. 139

Section 139 of the NPPF states that “Non-designated heritage assets of archeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.” This applies if other archeological remains are found at the development site, which are shown to be associated with the Roman Villa, they then become of significant national importance.

Paragraph 132: states that “when considering the impact of a proposed development on a designated heritage asset (e.g. Blenheim Palace, Blenheim Roman Villa) great weight should be given to the asset’s conservation.” However, “**Significance may be harmed (by) development within its setting**. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of heritage assets of the highest significance, notably scheduled monuments, Grade I registered parks and gardens and World Heritage Sites, should be wholly exceptional.”

WAG does not believe that this proposed development meets any of the NPPF criteria such as clear and convincing justification or being wholly exceptional.

On the contrary, the development will cause substantial harm to the immediate setting of Blenheim Palace as well as the Conservation Area of Woodstock.

5. Environment Agency: Foul Sewage

The Environment Agency has expressed concerns over foul sewers being connected to the Woodstock network and treatment works in that there is "...insufficient capacity within the existing network to accommodate the development which may be overwhelmed leading to instances of foul sewer flooding which in turn hinder the water quality of nearby water bodies, ex. surface water drainage. Our (EA) evidence suggests that there have been a number of sewer flooding /failure incidents in recent years." **Thames Water** has confirmed this. The development also has the potential ... (to) act as a source of pollutants more commonly associated with urban areas."

Without these conditions being met, "we consider the development to pose an unacceptable risk to the environment. So does WAG.

6. Thames Water: Demand for Water

"Thames Water is concerned that the network in this area (*Woodstock & vicinity*) may be unable to support the demand anticipated from this development" such as, "the net increase in water and waste water demand to serve the development and also any impact the development may have off site further down the network, if no or low water pressure and internal/external sewage flooding of property is to be avoided."

7. Highways Agency:

The Highways Agency is "concerned if any material increase were to occur on the Strategic Road Network (SRN) as a result of planned growth without careful consideration of mitigation measures.." In general, the Highway Agency has said that it will support "...sustainable measures which reduce demand and the need to travel. With up to 3,000 private cars, service vehicles, etc., coming onto the SRN it will hardly reduce the need to travel. As the HA sums it up, "*Infrastructure improvements on the SRN should only be considered as a last resort.*" WAG agrees.

8. Landscape and Visual Effects

The Cherwell Landscape Officer is concerned about, "the impact and effects of the development on the historic setting of Blenheim Park." So is WAG.

9. Lighting, Noise and Vibration

Cherwell's Anti-Social Behaviour Manager has quipped that the proposals put forward by the developers for lighting, noise and vibration are **acceptable!**

It may be so for him but the residents certainly will not think so. The Airport manager has already expressed his serious concerns with lighting, noise and consequent vibrations.

10. Air Quality

Cherwell's Environmental Protection Officer has commented that the applicant's air quality assessment is acceptable. *WAG disagrees and has said so earlier in this representation.*

11. BBOWT Comments

"The applicant would need to demonstrate that a net gain in biodiversity would be delivered" and "show how lighting across the whole site is designed to minimize the impact upon wildlife..." WAG agrees.

12. Stagecoach Comments

Although favourable in terms of bus services, Stagecoach accepts that residents residing in the northern segment of the development would be more

than the threshold 400m from the nearest bus stop and would warrant longer walks. They say that the optimum bus stop site should be on the A44 near the Bladon Roundabout but the proposed bus stop would be 400m north of the Bladon Roundabout thus presenting a need to navigate two additional roundabouts in each direction compared to the present route."

This, WAG believes, will further cause traffic to build up at these points in both directions on the A44 as well as the A4095 through Bladon and Long Hanborough.

13. Sustrans Cycling Comments

"Although the application states 'walking and cycling are given a high priority' and aspires to 'provide the most direct routes' this has not been carried through to crossings within the development, where cars retain priority." And, pedestrian and cycle paths should take priority when crossing the primary road. "This would ... improve safety – particularly for children cycling to school."

14. Councils and Parishes Objecting to Development

In brief, to date, the following councils and parishes have **objected** to planning application 14/02204/HYBRID: Woodstock Town Council, Kirtlington Parish, Shipton on Cherwell & Thrupp, Kidlington Parish and Gosford & Water Eaton Parish.

15. CPRE Bicester & West Oxfordshire District Representation

The Campaign to Protect Rural England representatives above have filed a strongly worded objection to the Pye-Blenheim Planning Application citing that the proposal is of massive scale, premature and surplus to need. It constitutes a strategic development not represented in the Cherwell or West Oxfordshire District Local Plans.

16. Community Severance

The proposed development would sever Woodstock into three separate communities; Old Woodstock, Woodstock Proper and New Woodstock each with their own social networks, contacts and interests.

17. Woodstock Town Centre

The development with its proposed supermarket and retail spaces will most certainly damage the vitality and viability of the town's existing business centre. It will not enhance the character nor improve the environment of the Woodstock town centre but will detract from it and should be resisted. There is no demonstrated compelling or overwhelming need (except the applicant's say so) for an "out of town" shopping centre on the SE edge of Woodstock .

WAG agrees that, "out of town retail and shopping centres draw people away from town centres and require access by car. Parking is an almost universal problem, especially in historic town centres like Woodstock, which attract tourists nationally and from overseas. The problem remains to be solved.

WAG supports the WODC "Town Centre" Policy, i.e., "to protect and improve the town centres of Oxfordshire and in particular that of Woodstock.

17. Conclusion

Based upon all of the above planning considerations, there is only one conclusion, this planning application must be rejected for the good of the people of Oxfordshire and of the Cherwell District.

Dr. Robert W. McGurrin, Chairman, Woodstock Action Group (WAG)