

1 Hart Walk
Upper Heyford
Bicester
Oxfordshire
OX25 5AF

1st June 2020

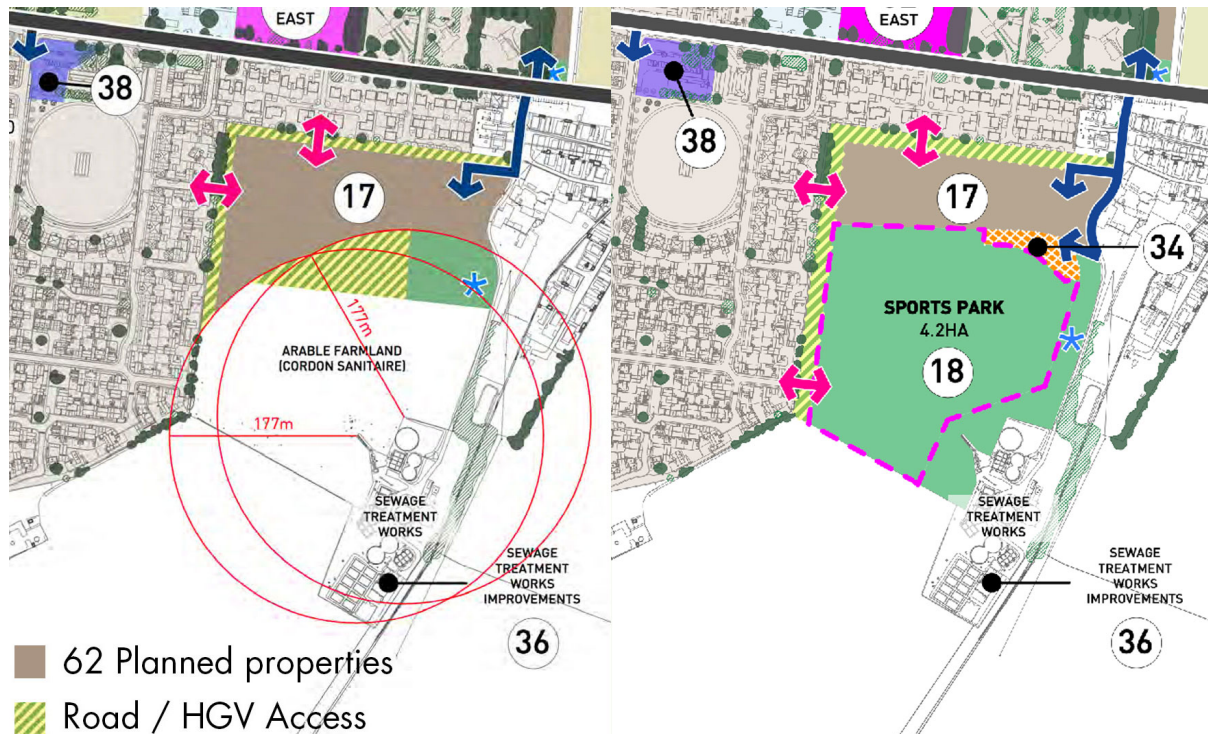
Your Ref: 18/00825/HYBRID

Dear Mr Lewis,

With regard to the revised application, we would firstly like to object to the timing of this. The application plans were submitted on the 18th March, two days after the Government lockdown as a response to COVID-19. People are having to deal with employment uncertainty, with friends and families being apart, and people are getting sick and actually dying. This seems like a totally inappropriate time to be rushing planning permission through. Judging by the fact that only a handful of comments have been added prove that people have more pressing matters at this moment in time. We question the ethics of this timings.

While we do support the plans in general, we continue to still object to the development of Parcels 17 and now 18 and 34. All of which fall outside the original boundary of former RAF Upper Heyford. We understand there have been upgrades to the sewage works but are unclear as to what they are, as we already smell the sewage plant on our property some evenings.

The new plans (P16-0631_08AI Composite Parameter Plan) seem to have removed the 177m exclusion zone around the Sewage Treatment plant. As you can see below the old plans are on the left and the latest on the right



The exclusion zone is there for the safety and wellbeing of the people who live and play in that zone. By blatantly ignoring it, you are likely to induce a health risk for the people who use the Sports Park. Can we remind you of the Anglian Water Risk Assessment for Sewage Treatment Works (attached). For a village of

2500 – 5000 residents, they recommend keeping proposed development 250m away from the STW to avoid a medium risk of odour.

This issue was raised by the Environment Agency to you in Condition 4 of their objection dated 8 August 2018.

It was also raised by Cherwell District Council on their position of Statement as of 1st July 2019:

Parcel 17: I have accepted the advice of my EHO that housing adjacent the sewage farm should not be considered. Again, theoretically this land could be used for some other proposed use and the alternative land made available for housing instead.

Document 4 SEI Proposed Dev also states that there is no physical upgrade work planned at this time. Which considering they are planning on building right next to the sewage works, we do find this rather concerning.

Parcel 18 has plans for outdoor lighting planned for the sports park. With Parcel 17 only having a maximum height of 10m, that means that light is going to spread beyond the sports park and into the neighbouring houses which causes great safety concerns.

Considering parcels 17, 18 and 34 are proposed on land outside the original boundary, would it not make more sense to move them to the land South of Camp road, classified at 16/02446/F NOT YET DETERMINED and move them into that development an area that is at least inside the original boundary? By doing this the current farmland can be left as arable.

We also have concerns about the increased traffic given there are no safety crossing for the school, it is only a matter of time before an accident happens.

With regard to the Sports Park and Pavilion, we object on the grounds of the light pollution from the park which at 18m is 8m taller than nearest structures which, as previously mentioned. We also don't agree with the noise pollution assessment of the sports park, as the effect of 56dB at 10m, seems awfully low for a sports park that is having a pavilion built next to it, as that seems to indicate that they would be catering for more than 'an organised football match being played in a park with a few spectators.' What is more concerning is that the same report goes on to say that a 10dB increase would have a major impact and be noticeable and very disruptive. Considering there are already numerous properties within 50m of the proposed pavilion, this is a poor location choice for a sports park.

Overall, we object to the building in parcels 17, 18 and 34 because to their close location to the Sewage Works which includes environment, health and safety which, even if upgraded, would still be within a high-risk area according to the Anglian Water Risk Assessment.

Yours sincerely



Sean and Helen Barnard

Asset Encroachment Risk Assessment Methodology: Guidance Document

Our risk assessment methodology is used to determine whether proposed development poses low, medium or high risk to Anglian Water assets; it has three steps.

Firstly the size of the treatment works and its distance from the proposed development are cross referenced on Table 1 below and a score is attributed dependant on the associated risks. This has been worked out using the maximum distances reached for an odour footprint of 1.5ou_m^3 - the odour concentration advised in the Environment Agency's H4 Guidance for assessing odour risk from treatment works.

For the purpose of this guidance document, the scores used within the methodology have been replaced with a visual scoring system of;




 Green= Low Risk
  Amber= Medium Risk
  Red= High Risk

Table 1. Risk Assessment Methodology

Population Served by STW (PE)	STW Category	Distance of proposed development from STW (metres)						
		50	100	150	200	250	300	400
0-1,000	1	Amber	Amber	Green	Green	Green	Green	Green
1,001-2,500	2	Red	Amber	Amber	Green	Green	Green	Green
2,501-5,000	3	Red	Red	Amber	Amber	Green	Green	Green
5,001-10,000	4	Red	Red	Red	Amber	Amber	Amber	Amber
10,001-50,000	5	Red	Red	Red	Red	Red	Red	Amber
50,001-100,000	6	Red	Red	Red	Red	Red	Red	Red
>100,001	7	Red	Red	Red	Red	Red	Red	Red

Secondly the score may be adjusted using the criteria below:

- If the STW handles primary sludge (overall score may be increased)
- If there are permanent odour control measures at the inlet works or within sludge treatment (overall score may be decreased)

The final stage is to look up the final score on Table 2 below. This recommends the next steps to take in advising potential developers and planners to inform planning decisions.

Table 2 Risk Assessment Methodology Outcomes

Risk	Outcome
Low Risk	There is a low risk of loss of amenity to development.
Medium Risk	There is a risk that odour may be a significant issue for the development and that Anglian Water may be adversely impacted by the site if developed. Further information should be requested regarding the proposed development and surrounding area.
High Risk	There is a high risk of loss of amenity posed to the development and may impact on Anglian Water's ability to operate. Further investigation is required regarding the proposed development and the surrounding area.

If the score falls within the medium to high risk category, the following factors would need to be considered before confirming the potential risk posed.

1. What is the planning status of the land?
2. What is the history of complaints at the particular treatment works?
3. How many properties are currently the same distance or less from the works as the proposed development?
4. What is the nature of proposed development?

Anglian Water is committed to enabling development whilst protecting our ability to operate effectively for our current and future customers. This guidance document seeks to outline the process we follow in determining encroachment risks of development proposed near our Sewage Treatment Works. We encourage early engagement particularly on encroachment issues and recommend discussion before submitting a planning application. We provide a pre-planning service (<http://www.anglianwater.co.uk/developers/planning/>) specifically to inform the planning process, this service includes our asset encroachment risk assessment.